**The Wilderness Society**

**Phone:** (303) 650-5935
**Fax:** (303) 395-0383

# FAX

**To:** 17758616745 **From:** Barbara Young
**Re:** **Date:** 11/05/2018

Enclosed please find The Wilderness Society's protest of the December 2018 oil and gas lease sale.

Total pages (including cover): 11

Thank you.

Juli Slivka
Assistant Director, Agency Policy & Planning
The Wilderness Society
11050 Pioneer Trail, Suite 202
Truckee, CA 96161
(303) 650-1179
jslivka@tws.org

The Wilderness Society

November 5, 2018

*Delivered by fax to (775) 861-6745*

Bureau of Land Management
Nevada State Office
1340 Financial Boulevard
Reno, NV 89502-7147

Re: Protest of BLM Nevada's December 2018 Oil and Gas Lease Sale

To Whom It May Concern:

Please accept and fully consider this timely protest of BLM Nevada's December 2018 lease sale. This protest challenges BLM's Environmental Assessment, DOI-BLM-NV-L000-2018-0002-EA, and the agency's decision to proceed with the sale of new leases located in the Ely District. This protest is filed in accordance with 43 CFR 3120.1-3. We specifically protest the following parcels:

| | | |
|---|---|---|
| NV-18-12-022 | NV-18-12-115 | NV-18-12-204 |
| NV-18-12-025 | NV-18-12-118 | NV-18-12-207 |
| NV-18-12-045 | NV-18-12-173 | NV-18-12-208 |
| NV-18-12-054 | NV-18-12-189 | NV-18-12-211 |
| NV-18-12-056 | NV-18-12-193 | |

**Interests of the Protesting Party**

The Wilderness Society ("TWS") has a long-standing interest in the management of Bureau of Land Management lands in Nevada and engages frequently in the decision-making processes for land use planning and project proposals that could potentially affect wilderness-quality lands and other important natural resources managed by the BLM in Nevada. TWS has expended significant resources field inventorying public lands in Nevada for wilderness characteristics. TWS members and staff enjoy a myriad of recreation opportunities on BLM-managed public lands, including hiking, biking, nature-viewing, photography, and the quiet contemplation in the solitude offered by wild places. Founded in 1935, our mission is to protect wilderness and inspire Americans to care for our wild places.

**Authorization to File This Protest**

Nada Culver is authorized to file this protect on behalf of The Wilderness Society and its members and supporters as Senior Counsel and Director of The Wilderness Society's BLM Action Center.

**Statement of Reasons**

## I. IM 2018-034 is invalid.

In attempting to sell these leases with reduced public comment periods and a grossly-inadequate ten-day protest period, BLM is following a process created by Instruction Memorandum (IM) 2018-034, which superseded and replaced the leasing reforms adopted in IM 2010-117. The new IM, however, was issued in violation of the notice-and-comment requirements of the Administrative Procedure Act (the APA) and is thus invalid. BLM may not rely on its invalid IM for this lease sale.

IM 2018-034 directs BLM to expedite its oil and gas lease sale process, and encourages the agency to minimize environmental review and public participation. Such an approach impedes informed decision-making, increases public controversy and prioritizes energy development above other resources and uses in violation of the multiple use mandate established in the Federal Land Policy and Management Act (FLPMA). By allowing BLM to drastically reduce or virtually eliminate the opportunity for public participation, and reducing the protest period to 10 days, IM 2018-034 effectively alters the substantive rights and interests of TWS and the public, and thus represents a substantive rule subject to the notice-and-comment requirements of the APA.

BLM's implementation of the new IM has deprived the public of meaningful opportunities to comment. By offering a shortened 15-day comment period on the Environmental Assessment and then a shortened 10-day protest period, the agency has significantly constrained our ability to participate in this lease sale.[1] Unlike the oil and gas industry, which is not required to complete any diligence on potential development plans or demonstrate that development would not harm other resources when submitting an Expression of Interest, the public is expected to show that leasing and development would have unacceptable impacts on other resources in order to object to leasing. The shortened comment periods are extremely burdensome, if not outright prohibitive, of the public's ability to effectively participate in the leasing process. A federal judge in Idaho recently affirmed this imbalance, writing, "The burden of such constraints upon public participation and compressed protest periods falls most heavily upon members of the public, as those who have nominated potential lease parcels and BLM have had far more time to evaluate and consider the details of such parcels." *Western Watersheds Project v. Zinke*, No. 1:18-cv-00187-REB, __ F. Supp. 3d __, 2018 WL 4550396, slip op. at 25 (D. Idaho Sept. 21, 2018).

Prior to issuance of IM 2018-034, BLM was required to undertake an inter-disciplinary review, to visit proposed parcels, and to provide for public participation in the leasing process, all of

[1] While BLM provided an additional comment period on the EA later, the agency did not notify the public or entities who had previously submitted comments that the comment period was re-opened, effectively rendering the additional comment period meaningless for facilitating public participation. We further note that while BLM is proposing to offer 32,924 acres for sale at this time, during the comment period BLM was analyzing 202 parcels covering 426,531 acres which we initially only had 15 days to review and comment on.

which provided the opportunity for BLM to understand the values at stake and to understand and address public concerns. After an opportunity for public comment, BLM also provided the public with 30 days to evaluate, and if necessary file, a protest. BLM had 60 days prior to a lease sale to resolve protests. That process, which was set forth in IM 2010-117, did not impair our rights or impose significant new burdens on our ability to engage in the leasing of public lands and minerals. By contrast, IM 2018-034 imposes significant burdens on our participation in the leasing process, as described above. BLM's issuance of IM 2018-034 without notice-and-comment rulemaking violated the APA, and this lease sale cannot proceed under the procedures established by the invalid IM. Similarly, IM 2018-034 is inconsistent with FLPMA's public participation requirements for the reasons described in the *Western Watersheds Project v. Zinke* order.

Perhaps even worse, IM 2018-034 creates a one-sided burden on requests that BLM defer lease parcels: it requires consultation with BLM's Washington, DC headquarters to defer parcels, but not to dismiss protests and proceed with a lease sale. These steps, outlined in IM 2018-034, effectively alter the substantive rights and interests of our organizations, local governments and the public, and thus cannot be implemented without notice-and-comment rulemaking. BLM violated the APA by issuing the new IM without following notice and comment, and violates FLPMA's public participation requirements. BLM's abrupt issuance of new guidance did not provide a sufficient, reasoned explanation for the significant reversals in process and rights, which we and other stakeholders have relied upon since 2010. Because IM 2018-034 was promulgated in violation of law, BLM cannot undertake the sale of the protested parcels using the process established by the new IM.

## II. BLM has failed to consider a range of alternatives.

The National Environmental Policy Act (NEPA) generally requires the lead agency for a given project to conduct an alternatives analysis for "any proposal which involves unresolved conflicts concerning alternative uses of available resources." 42 U.S.C. § 4332(2)(E). The regulations further specify that the agency must "rigorously explore and objectively evaluation all reasonable alternatives" including those "reasonable alternatives not within the jurisdiction of the lead agency," so as to "provid[e] a clear basis for choice among the option." 40 C.F.R. § 1502.14. This requirement applies equally to EAs and EISs. *Davis v. Mineta*, 302 F.3d 1104, 1120 (10th Cir. 2002); *Bob Marshall Alliance v. Hodel*, 852 F.2d 1223, 1228-29 (9th Cir. 1988).

The range of alternatives is the heart of a NEPA document because "[w]ithout substantive, comparative environmental impact information regarding other possible courses of action, the ability of [a NEPA analysis] to inform agency deliberation and facilitate public involvement would be greatly degraded." *N.M. ex rel. Richardson v. BLM* , 565 F.3d 683, 708 (10th Cir. 2009). That analysis must cover a reasonable range of alternatives, so that an agency can make an informed choice from the spectrum of reasonable options.

The underlying Ely RMP never considered alternatives relevant to this lease sale, such as offering some but not all of the parcels considered here. Nor did the RMP consider the alternative of deferring all of these particular leases. The RMP only considered alternatives generally opening or closing to leasing large areas measured in the millions of acres. For

example, the proposed action alternative for the 2008 Ely RMP opened six million acres for leasing under standard terms and conditions, while closing 1.46 million acres. 2008 Ely RMP FEIS at 2.9-33 to 34 (Table 2.9-1). None of the alternatives in the underlying RMP addressed closing some or all of the particular parcel areas here to leasing—much less a temporary deferral of leasing those parcels.

Even if lands at issue here are open for leasing under the Ely RMP, it would be entirely reasonable for BLM to consider deferring parcels that have lands with wilderness character or other important resources. Moreover, to the extent certain parcels have only low potential for development, the alternative of deferring them appears even more reasonable. These options have never been analyzed. In our comments on the EA, we proposed several alternatives which the agency should have evaluated in this lease sale, including:

- An alternative to protect wilderness resources from oil and gas impacts, through deferring lease parcels in lands with wilderness characteristics and/or offering those parcels with NSO stipulations. Four lease parcels in the December lease sale overlap with lands with wilderness characteristics that the agency has inventoried but not made management decisions for in a land use plan. See section III of this protest. It is well within BLM's authority to defer leasing in inventoried lands with wilderness characteristics until the agency has considered protective management for those units in a land use planning process with public input.

- An alternative that defers leasing the proposed parcels until BLM demonstrates that these are "lands…which are known or believed to contain oil or gas deposits…" 30 U.S.C. § 226(a). As discussed later in these comments, the EA provides no evidence that the proposed parcels contain oil or gas deposits, as required by the Mineral Leasing Act (MLA). *Ibid.*; *see also Vessels Coal Gas, Inc.*, 175 IBLA 8, 25 (2008) ("It is well-settled under the MLA that competitive leasing is to be based upon reasonable assurance of an existing mineral deposit."). Consistent with the MLA and BLM's multiple use mandate, BLM should not issue leases unless and until BLM has shown that the area is known to contain resources that have the potential to be developed.

- An alternative that defers leasing the proposed parcels until production in Nevada is on par with other western states. According to BLM data, at least 50% of federal oil and gas leases are in production in Colorado, New Mexico, Utah and Wyoming. Nevada, by contrast, has 6% of leases in production.[2] BLM should evaluate an alternative to not issue new leases until 50% of federal oil and gas leases are in production in the state to ensure "reasonable diligence" requirements are being met under the MLA. 30 U.S.C. § 187. This would also be a fiscally responsible alternative because leases in low potential areas generate minimal to no revenue but can carry significant cost in terms of resource use conflicts. Leases in low potential areas are most likely to be sold at or near the minimum bid of $2/acre, or non-competitively, and they are least likely to actually produce oil or gas and generate royalties.[3] This has proved to be true in Nevada, where federal oil and

[2] https://www.blm.gov/programs/energy-and-minerals/oil-and-gas/oil-and-gas-statistics

[3] Center for Western Priorities, "A Fair Share" ("Oil Companies Can Obtain an Acre of Public Land for Less than the Price of a Big Mac. The minimum bid required to obtain public lands at oil and gas auctions stands at $2.00 per

gas lease sales have generated just $0.31 per acre offered in bonus bids over the past 3 years, compared to other western states which generate hundreds or even thousands of dollars per acre offered.

| Nevada Sale[4] | Acres Offered | Bonus Bids |
|---|---|---|
| Mar. 2015 | 25,882 | $30,496 |
| June 2015 | 256,875 | 0 |
| Dec. 2015 | 3,641 | 0 |
| Mar. 2016 | 50,416 | 0 |
| June 2016 | 74,661 | $24,740 |
| Mar. 2017 | 115,970 | $74,780 |
| June 2017 | 195,614 | $29,440 |
| Sept. 2017 | 3,680 | $33,120 |
| Dec. 2017 | 388,697 | $66,978 |
| Mar. 2018 | 69,692 | $152,061.50 |
| June 2018 | 313,715 | $139,896.00 |
| Sept. 2018 | 295,174 | 0 |
| **Total** | **1,794,017** | **$551,511.50 ($0.31/acre offered)** |

In addition to violating NEPA, failing to consider alternatives that would protect other public lands resources from oil and gas development also violates FLPMA. Considering only one alternative in which BLM would offer all oil and gas lease parcels for sale, regardless of other values present on these public lands that could be harmed by oil and gas development, would indicate a preference for oil and gas leasing and development over other multiple uses. Federal courts have consistently rejected efforts to affirmatively elevate energy development over other uses of public lands. In the seminal case, *N.M. ex rel. Richardson v. BLM*, the Tenth Circuit put to rest the notion that BLM can manage chiefly for energy development, declaring that "[i]t is past doubt that the principle of multiple use does not require BLM to prioritize development over other uses." 565 F.3d 683, 710 (10th Cir. 2009); *see also S. Utah Wilderness Alliance v. Norton*, 542 U.S. 52, 58 (2004) (defining "multiple use management" as "striking a balance among the many competing uses to which land can be put"). Other federal courts have agreed. *See, e.g., Colo. Envtl. Coalition v. Salazar*, 875 F. Supp. 2d 1233, 1249 (D. Colo. 2012) (rejecting oil and gas leasing plan that failed to adequately consider other uses of public lands). Thus, any action by BLM that seeks to prioritize oil and gas leasing and development as the dominant use of public lands would violate FLPMA.

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acre, an amount that has not been increased in decades. In 2014, oil companies obtained nearly 100,000 acres in Western states for only $2.00 per acre. . . .Oil companies are sitting on nearly 22 million acres of American lands without producing oil and gas from them. It only costs $1.50 per year to keep public lands idle, which provides little incentive to generate oil and gas or avoid land speculation.").

[4] All data obtained from BLM (https://www.blm.gov/programs/energy-and-minerals/oil-and-gas/leasing/regional-lease-sales/nevada) and EnergyNet (https://www.energynet.com/govt_listing.pl).

## III. BLM must defer leasing in lands with wilderness characteristics until management decisions are made for those areas.

Parcels 189, 207, 208 and 211 overlap with areas that BLM has inventoried and found to possess wilderness characteristics. As confirmed in the EA, these areas have not been considered for protective management in a land use plan: "There has not been a land use plan amendment to determine if or how these [lands with wilderness characteristics] units would be managed to protect the wilderness characteristics." EA p. 21. Therefore, BLM must defer leasing these areas until the agency has had an opportunity to make management decisions for those lands through a public planning process.

The EA acknowledges that oil and gas leasing could lead to impacts that would impair or eliminate wilderness characteristics. *Id.* p. 23. BLM should not authorize actions that would impair or eliminate a public land resource before the agency has had an opportunity to determine if that resource should be protectively managed. The appropriate avenue for making such determinations is the land use planning process, in which BLM assesses various resources at the landscape level and makes integrated management decisions with robust public input.

Neither the MLA, FLPMA nor any other statutory mandate requires BLM to offer public lands and minerals for oil and gas leasing simply because they are nominated, even if those lands are allocated as available to leasing in the governing land use plan. BLM's Land Use Planning Handbook 1601-1, § VII (E) specifically states that it may defer decisions in a planning area even when the existing plan allows the action if the choice of alternatives in an RMP revision may be impacted. The 10th Circuit Court of Appeals confirmed this discretion in *New Mexico v. BLM*, 565 F.3d. 683 at 698 (10th Cir. 2009) when it stated, "[i]f the agency wishes to allow oil and gas leasing in the plan area it must undertake additional analysis…but it retains the option of ceasing such proceedings entirely". BLM regularly exercises this discretion to defer parcels in inventoried lands with wilderness characteristics for which the agency has not yet made management decisions.

For example, the White River Field Office deferred leasing on over 250,000 acres of inventoried wilderness characteristics while it was completing an oil and gas RMP amendment:

> The WRFO is currently working on a Resource Management Plan Amendment and associated EIS that will address the potential impacts of significant increases in oil and gas development within the field office over the next 20 years… Because the leasing of lands with wilderness characteristics is likely to result in indirect, adverse impacts to this resource value, it is recommended that until a decision is made on the management of these units, the areas where lands with wilderness characteristics units overlap with nominated parcels be deferred, as under Alternative 3, with the exception being the tracts from Alternative 2 listed in the above . . . which can be leased, and mitigated if needed, to result in not impacting lands with wilderness characteristics.[5]

[5] BLM, EA for the White River Field Office June 2014 Competitive Oil & Gas Lease Sale at 77, *available at* http://www.blm.gov/pgdata/etc/medialib/blm/co/programs/oil_and_gas/Lease_Sale/2014/may_2013.Par.34116.File.dat/WR_doiblmco11020130099ea_3.12.14_EA_MLP%20format_Master.pdf.

As another example, the Grand Junction Field Office deferred lease parcels from its December 2017 lease sale in areas that BLM recently inventoried and found to have wilderness characteristics. BLM states: "Portions of the following parcels were deferred due to having lands with wilderness characteristics that require further evaluation." Preliminary DNA, p. 1. The Grand Junction Field Office completed its RMP revision in 2015 but has still determined that it is inappropriate to lease areas that have been inventoried and found to possess wilderness characteristics since the RMP was completed in order to consider management options for those wilderness resources.

BLM Nevada must similarly defer leasing in inventoried lands with wilderness characteristics that have not been considered for protective management in a land use plan. This approach is consistent with agency policy and authority, and is critical to preserving BLM's ability to make management decisions for those newly-inventoried wilderness resources through a public planning process.

## IV. Leasing lands with low potential for development is inconsistent with FLPMA and the MLA.

The EA states that the need for the proposed action is to "respond to the nomination or Expressions of Interests (EOIs) for leasing, consistent with the BLM's responsibility under the MLA…to promote the development of oil and gas on the public domain." EA p. 1. In fact, the MLA is structured to facilitate actual production of federal minerals, and thus its faithful application should discourage leasing of low potential lands. The MLA directs BLM to hold periodic oil and gas lease sales for "lands…which are known or believed to contain oil or gas deposits…" 30 U.S.C. § 226(a). These sales are supposed to foster responsible oil and gas development, which lessees must carry out with "reasonable diligence." 30 U.S.C. § 187; *see also* BLM Form 3100-11 § 4 ("Lessee must exercise reasonable diligence in developing and producing…leased resources."). As demonstrated below, BLM Nevada's oil and gas leasing program caters almost exclusively to speculative leasing, leading to an utterly disorderly and ineffective process that fosters essentially no development of fluid mineral resources and therefore does not carry out the provisions or intention of the MLA or FLPMA.

The EA provides no evidence that the proposed parcels contain oil or gas deposits, as required by the MLA. 30 U.S.C. § 226(a); *see also Vessels Coal Gas, Inc.*, 175 IBLA 8, 25 (2008) ("It is well-settled under the MLA that competitive leasing is to be based upon reasonable assurance of an existing mineral deposit."). In fact, there is abundant evidence to the contrary – that the lands encompassed by the parcels are generally lacking in marketable oil and gas resources. For example, the discussion of the Reasonably Foreseeable Future Development Scenario (RFFD) recounts that only 16 Applications for Permit to Drill (APDs) have been approved since the Ely RMP was finalized in 2008 whereas 132 wells had been anticipated. BLM concludes: "Therefore, it would be highly speculative that 438 wells would be drilled over the next 9 years." EA p. 9.

The problems created by offering low potential lands for lease are prevalent in Nevada, where BLM is currently spending an excessive amount of time and resources evaluating oil and gas

leases that industry is either not bidding on or will likely never develop. Over the past 3 years, BLM Nevada has only sold 8.6% of the acres it has offered for sale, compared with other western states which are generally selling 70% or more.[6]

| SALE | OFFERED (PARCELS/ACRES) | SOLD (PARCELS/ACRES) |
|---|---|---|
| **Mar. 2015** | 24 / 25,882 | 13 / 15,244 |
| **June 2015** | 124 / 256,875 | 0 |
| **Dec. 2015** | 3 / 3,641 | 0 |
| **Mar. 2016** | 39 / 50,416 | 0 |
| **June 2016** | 42 / 74,661 | 4 / 3,765 |
| **Mar. 2017** | 67 / 115,970 | 20 / 35,502 |
| **June 2017** | 106 / 195,614 | 3 / 5,760 |
| **Sept. 2017** | 3 / 3,680 | 3 /3,680 |
| **Dec. 2017** | 208 / 388,697 | 17 / 33,483 |
| **Mar. 2018** | 40 / 69,691 | 11 / 19,432 |
| **June 2018** | 166 / 313,715 | 22 / 38,579 |
| **Sept. 2018** | 144 / 295,174 | 0 / 0 |
| **Total** | 966 / 1,794,017 | 93 / 155,446 (8.6% of acres offered) |

This underscores just how inefficient and wasteful the oil and gas program in Nevada has become, and also demonstrates that BLM Nevada's oil and gas leasing program is inconsistent with the direction set forth in the MLA. BLM would be well-served by deferring these lease parcels and preparing a programmatic EIS that considers alternative approaches for managing the oil and gas program in Nevada.

Leasing in low potential areas, like those in this sale, gives preference to oil and gas development at the expense of other uses because the presence of leases can limit BLM's ability to manage for other resources, in violation of FLPMA's multiple use mandate. In the recently finalized Colorado River Valley Resource Management Plan, for example, BLM decided against managing lands for protection of wilderness characteristics in the Grand Hogback lands with wilderness characteristics unit based specifically on the presence of oil and gas leases, even though the leases were non-producing:

> The Grand Hogback citizens' wilderness proposal unit contains 11,360 acres of BLM lands. All of the proposed area meets the overall criteria for wilderness character…There are six active oil and gas leases within the unit, totaling approximately 2,240 acres. None of these leases shows any active drilling or has previously drilled wells. The ability to manage for wilderness character would be difficult. If the current acres in the area continue to be leased and experience any development, protecting the unit's wilderness characteristics would be infeasible…

Proposed Colorado River Valley RMP (2015), p. 3-135. The presence of leases can also limit BLM's ability to manage for other important, non-wilderness values, like renewable energy

[6] All data obtained from BLM (https://www.blm.gov/programs/energy-and-minerals/oil-and-gas/leasing/regional-lease-sales/nevada) and EnergyNet (https://www.energynet.com/govt_listing.pl).

projects. *See, e.g.,* Proposed White River Oil and Gas RMP Amendment, p. 4-498 ("Areas closed to leasing…indirectly limit the potential for oil and gas developments to preclude other land use authorizations not related to oil and gas (e.g., renewable energy developments, transmission lines) in those areas.").

In offering the leases involved in this sale, BLM runs a similar risk of precluding management decisions for other resources in the Ely District, where BLM has identified lands with wilderness characteristics that BLM has not yet decided management for through a public land use planning process. The area also has almost no history of successful oil and gas exploration and development or potential for future successful development. In prioritizing leasing of low potential lands, BLM is violating FLPMA's multiple use mandate and improperly elevating oil and gas leasing above other multiple uses, as well as failing to appropriately implement the MLA.

## V. The legal rationale for the Preliminary Injunction issued by the U.S. District Court for the District of Idaho regarding IM 2018-034 also applies to lands outside the planning area for the greater sage-grouse plan amendment.

In September, the U.S. District Court for the District of Idaho issued a Memorandum Decision and Preliminary Injunction enjoining and restraining the BLM from implementing certain provisions of the agency's current oil and gas leasing policy, Instruction Memorandum (IM) 2018-034, for lease sales within the planning area of the greater sage-grouse conservation plans. *Western Watersheds Project v. Zinke*, No. 1:18-cv-00187-REB (D. Idaho Sept. 21, 2018).

The Preliminary Injunction requires that BLM offer meaningful opportunities for the public to participate in lease sales within greater sage-grouse management areas, in accordance with the agency's obligations under NEPA and FLPMA. However, beyond the express requirements of the Preliminary Injunction, the court's decision is a broader indictment of BLM's attempts to cut the public out of oil and gas leasing decisions affecting our public lands. The court's reasoning, therefore, applies more broadly to all oil and gas leasing decisions.

Stating that, "It is well-settled that public involvement in oil and gas leasing is required under FLPMA and NEPA," the court found that the plaintiffs are likely to succeed on the fundamental question of whether BLM's statutory obligations require a minimum level of public involvement in leasing decisions, and that the IM 2018-034 procedures fall short of those obligations. *Id.* at 36-37, 40-41.

The court further concluded that:

> The record contains significant evidence indicating that BLM made an intentional decision to limit the opportunity for (and even in some circumstances to preclude entirely) any contemporaneous public involvement in decisions concerning whether to grant oil and gas leases on federal lands. . . . Doing so certainly serves to meet the stated "purpose" of IM 2018-034 – that is, reducing or precluding public participation will "streamline the leasing process to alleviate unnecessary impediments and burdens, to expedite the offering of lands for lease . . . ." Yet, the route chosen by BLM to reach that

> destination is problematic because **the public involvement requirements of FLPMA and NEPA cannot be set aside in the name of expediting oil and gas lease sales. The benefits of public involvement and the mechanism by which public involvement is obtained are not 'unnecessary impediments and burdens.**"

*Id.* at 41 (emphasis added). BLM must make diligent efforts to involve the public in oil and gas leasing decisions for public lands and minerals, regardless of whether parcels are within greater sage-grouse planning areas. BLM should therefore not limit compliance with the Preliminary Injunction to lease parcels within greater sage-grouse habitat, and should defer all of the parcels in the December lease sale to ensure that BLM meets its legal requirements for facilitating public participation in lease sale processes.

**Conclusion**

We hope to see BLM complete needed analysis and fully comply with applicable law and guidance prior to moving forward with this lease sale.

Sincerely,

Nada Culver, Director and Senior Counsel
**The Wilderness Society**
1660 Wynkoop Street, #850
Denver, CO 80202
303-225-4635
nada_culver@tws.org