

From: [Matt Kales](#)
To: [Pat Deibert](#)
Cc: [Mary Grim](#); [Jesse DElia](#); [Jeff Berglund](#); [Brent Esmoil](#); [Jodi Bush](#); [Lief Wiechman](#); [Nicole Alt](#)
Subject: RE: MT BLM buffer proposal
Date: Monday, February 23, 2015 3:36:41 PM

Thanks, all, for the quick turnaround and the good follow-on questions you generated. I'll move this to Noreen and recommend she surface these issues with the NPT tomorrow. Much obliged.

From: Deibert, Pat [mailto:pat_deibert@fws.gov]
Sent: Monday, February 23, 2015 3:29 PM
To: Matt Kales
Cc: Mary Grim; Jesse DElia; Jeff Berglund; Brent Esmoil; Jodi Bush; Lief Wiechman; Nicole Alt
Subject: MT BLM buffer proposal

Matt and all -

I spoke with Jeff Berglund regarding the buffers drop in language (including Attachment X), and the tiered buffer situation in MT in GH. The 0.6 mi NSO and 2 mi CSU combination in GH are allocative decisions in MT (for fluid minerals only) that we have defacto agreed to. (we never opposed 0.6 NSO/2 mi CSU but did encourage greater distances where appropriate based on screening criteria, etc. Also, it's important to note that in commenting on the MT State plan in December 2013, which proposed a 0.25 mi lek buffer in GH, we encouraged a minimum 0.6 mi lek buffer in GH). So this is not new information. However, this exercise has generated several questions:

1. If the 0.6 NSO and 2.0 CSU are allocative decisions, how does that affect the drop in language stating compliance with the USGS buffer report (as stated in their Attachment X to the buffer drop-in language) and visa-versa? Does allocation "trump" the attachment making the buffer discussion moot for fluid mineral development in GH?
 2. How will the proposed buffer language "mesh" with BLM mitigation policies? Would residual impacts from the 0.6/2 mi fluid mineral allocation in GH be mitigated to net conservation gain?
 3. How will the proposed allocation and buffer language fit into (interact with) the screening criteria that BLM developed, with our input?
4. Could the 0.6 mi NSO/2 mi CSU allocation be considered the "default minimum" buffer for fluid mineral development in GH, with the opportunity to apply other distances in Attachment X as appropriate?

We believe these are questions that Noreen should pose tomorrow so that we can more fully understand how all of this interacts. Only with that information can we fully appreciate the conservation implications of this language.

Jeff also advised that he typically arrives for work at 6:30 a.m., so would be available to answer any last minute questions you or Noreen may have before the 8 a.m. call.

pat



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got leks?