

Northwest Colorado BLM/USFS GRSG EIS update, February 2014

- The BLM/USFS preferred alternative, released last August, proposed a variety of protections for GRSG. Most importantly: 1) No Surface Occupancy (NSO) for new oil and gas leases throughout PPH, 2) All PPH would be designated an Avoidance Area for ROWs, 3) All PPH would be designated an Exclusion Area for large transmission lines, except a corridor to allow for upcoming projects such as the TransWest Express, 4) A 5% cap for anthropogenic disturbances would be established in PPH.
- We have had recent discussions with BLM/USFS on the crafting of their proposed plan. They now are formulating a somewhat more lek-based protection approach. For active leks they are contemplating a 1-mile no-lease protective buffer, a 2-mile NSO without exceptions, and a 4-mile NSO with exceptions (and consultation with CPW) for fluid mineral development. This would increase protection for GRSG habitat within 2-miles of active leks (in PPH and PGH).
- A 3% disturbance cap would be established for all activities on all land ownerships within Colorado's 21 management zones. No new leases would be offered or ROWs granted in any management zone that has reached 3% anthropogenic disturbance (including state and private lands). BLM proposes not to include fire or agriculture in their disturbance calculations. As with the preferred alternative, a 4-mile Timing Limitation would also be established around active leks for the breeding, nesting, and early brood-rearing seasons.
- An issue in Colorado with the 1, 2, and 4 mile buffer approach is the large transmission line corridors. The Transwest Express and Gateway South, nNational priorities for alternative energy, have a corridor that may be within 1 mile, and certainly within 2 miles, of some active leks and may violate the 1 mile NSO.
- Throughout this process we have continually worked with and provided comments to BLM/USFS on their efforts. We have repeatedly mentioned that consistency with other BLM plans is important, although local variation can be warranted with good reason and proper justification. Ultimately, sufficient protection for GRSG is most important. We have also repeatedly made recommendations on how to increase protection for GRSG in their planning; they generally incorporate our suggestions. The details of their proposed plan are still being discussed, but overall it looks like it will result in strong protections for GRSG.

Comment [CC1]: I recommend deleting this so that no one gets the impression that private actions would be capped.

Comment [CC2]: Perhaps we should completely rewrite this bullet to include all of the most significant threats to GRSG in CO under BLM's control—at least partially (in Creed's opinion): How about this:

The three primary upcoming issues for GRSG on federal land in Colorado are : 1) proposed transmission lines, 2) development of existing oil and gas leases, and 3) coal mine expansion on existing leases. The BLM EIS proposes to minimize effects from these upcoming actions, but due to existing lease rights, and the national priority for construction of new transmission lines for alternative energy, there will be impacts to GRSG and the need for appropriate mitigation.

Oil and Gas Activity in North Park and other areas of NW Colorado

- No GRSG PPH habitat was leased by BLM in Colorado for oil and gas in 2013. There were two parcels nominated in North Park for the May 2013 leasing sale in GRSG habitat, but they were deferred. Twenty nine²⁹ Federal Parcels were nominated for lease in February 2013 in the Little Snake FO, but all parcels containing GRSG PPH were

deferred until the GRSR EIS is done. BLM has not offered any leases in PPH in over a year. A limited number in PGH in the LSFO have been offered (and perhaps sold), but with the disturbance cap pursuant to the existing LSFO RMP.

- According to a BLM petroleum engineer, oil and gas development has slowed in general in CO (due to lower price of natural gas). Encana has basically pulled their rigs out of the state, even on their private land.
- According to the BakerHughes rig count website, which includes drilling on private land, there are currently no drill rigs in Jackson, Grand, Routt, Moffat, or Eagle counties. There are 2 Rigs in Rio Blanco County and a handful in Garfield county near I-70 (outside of GRSR habitat).
- COGCC oil and gas staff report states that 12 drilling permits were issued for Jackson County in 2013, 5 in 2012, and none yet this year. By comparison, Garfield County had 870 issued in 2013. Drilling permits are not always immediately acted upon and 5 actual well starts were done in Jackson County in 2013. None in 2012, and none so far there this year. All told, Jackson County has 192 active wells (Garfield County has 10,569; Moffat County has 624).
- Our conclusion is that there is no evidence of a rush for oil or gas development prior to completion of the RMP amendment process in North Park or elsewhere in western Colorado.