

From: [Berglund, Jeff](#)
To: [Noreen Walsh](#)
Cc: [Michael Thabault](#); [Nicole Alt](#); [Jodi Bush](#); [Matt Kales](#)
Subject: Re: GRSG: MT subsurface/surface map
Date: Monday, November 24, 2014 7:31:22 AM

Hi all. The large area depicted on the map is why we have some concern with potentially losing PHMA-wide NSO protection for oil & gas development on BLM lands, to be potentially replaced with a 0.6-mi lek NSO. This is important, given that O&G development is one of the major threats in MT. We requested some internal GIS help with that comparison last week and they're working on it. We've requested a comparison of BLM surface/subsurface PHMA acreage for MT with the area of PHMA that would be encapsulated by 0.6 mi lek NSOs on MT BLM surface/subsurface lands. Other components to ultimately be factored in include the reasonably foreseeable development projections for oil & gas development on BLM lands (which would focus where this issue is most likely to matter) and the potential offsetting benefit(?) of BLM implementing a 0.6-mi lek NSO buffer throughout PHMA for all activities (which they currently do not propose).

We're also trying to get a better handle on the regulatory scope of the State EO regarding O&G development on private lands. There is a State permit required, so our hope is that the EO would apply. The State's working to answer our regulatory scope questions on the EO. So the bottom line is that it's an important issue in MT, with several moving and unresolved components, and we'll have to collectively get our arms around what conservation would result from these various approaches.

Just curious - I don't know where BLM is currently heading with the O&G approach, but if they are dead-set on following the state approach, has anyone mentioned the possibility of leaving the PHMA-wide NSOs in place for O&G development relative to the stronghold area?

Apologies for the lack of any solid answers...

Jeff

On Sun, Nov 23, 2014 at 1:02 PM, Noreen Walsh <noreen_walsh@fws.gov> wrote:

BLM controls a great deal of the subsurface mineral rights in many MT PACs, particularly the northern PACs.

Can you let me know quickly how you think this impacts your assessment of the state's EO and the interplay with BLM plans?

Thanks,

Noreen

Noreen Walsh

Regional Director

Mountain-Prairie Region

U. S. Fish and Wildlife Service

303 236 7920

The Mountain-Prairie Region of the

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Jeff Berglund
Fish and Wildlife Biologist
U.S. Fish and Wildlife Service
Montana Field Office
585 Shepard Way, Suite 1
Helena, MT 59601
(406) 449-5225, ext. 206