

**From:** Samantha McDonald  
**To:** ["Williams, Timothy"](#)  
**Subject:** RE: Contact Help?  
**Date:** Wednesday, June 21, 2017 6:26:09 PM

---

Two more questions:

1. Who is the Secretary's scheduler?
2. Did the members of the Sage Grouse Review Team get named?

From: Samantha McDonald  
Sent: Monday, June 19, 2017 9:37 AM  
To: Williams, Timothy  
Subject: RE: Contact Help?

Thank you!

From: Williams, Timothy [[mailto:timothy\\_williams@ios.doi.gov](mailto:timothy_williams@ios.doi.gov)]  
Sent: Monday, June 19, 2017 9:29 AM  
To: Samantha McDonald <[SMcDonald@ipaa.org](mailto:SMcDonald@ipaa.org)>  
Subject: Re: Contact Help?

Thomas Irwin

202-208-4545

[thomas\\_irwin@fws.gov](mailto:thomas_irwin@fws.gov)

On Mon, Jun 19, 2017 at 8:19 AM, Samantha McDonald <[SMcDonald@ipaa.org](mailto:SMcDonald@ipaa.org)> wrote:

Not yet. Admittedly, I have been swamped and not very aggressive at hunting down an email. Do you have a contact?

From: Williams, Timothy [[mailto:timothy\\_williams@ios.doi.gov](mailto:timothy_williams@ios.doi.gov)]  
Sent: Monday, June 19, 2017 8:18 AM  
To: Samantha McDonald <[SMcDonald@ipaa.org](mailto:SMcDonald@ipaa.org)>  
Subject: Re: Contact Help?

Sorry for the late reply. HAVe you been able to arrange a meeting?

**From:** Diemer True  
**To:** [casey\\_hammond@ios.doi.gov](mailto:casey_hammond@ios.doi.gov)  
**Cc:** [Samantha McDonald](#)  
**Subject:** Talking Points for Casey Hammond  
**Date:** Wednesday, July 19, 2017 3:30:09 PM  
**Attachments:** [briefing Captive Breeding.docx](#)

---

Thank you for talking with me. Here is a brief summary of the Wyoming initiative to attempt to raise a captive breeding program for Greater Sage-grouse.

Please let me know if I can be of further assistance.

Best regards

Diemer

2017

## The Wyoming Initiative to Establish a Captive Breeding Population of Greater Sage-grouse

The Wyoming legislature adopted legislation permitting certified private game bird farms to collect eggs, incubate, raise and release native Greater Sage-Grouse. This legislation puts in place the authority and regulatory safeguards to insure the safety and integrity of the Sage Grouse raised on private farms. The legislation received strong political support with a vote of 52 ay, 6 no and 2 excused in the House and 22 ay votes and 8 no votes in the senate. To our knowledge no other state has authorized such a program.

The Department of Interior has expended immense time, energy and resources to develop the gold standard for Sage Grouse conservation. The Department has spent or committed \$760 Million on Sage Grouse initiatives since 2010. This Wyoming legislation would complement the Sage Grouse Management Plans that are currently in place. **This legislation puts in place one more potentially viable practice that would help safeguard the Sage-grouse population and prevent the bird from being listed as endangered. .**

### **Reasons for the legislation:**

- Allows for the raising of Wyoming bred and raised Sage Grouse on certified bird farms to be used for a variety of purposes
  - Research into the species biology and habitat
  - Supplement natural Grouse numbers to insure healthy and robust populations
  - Use as potential mitigation for NEPA and related considerations for energy and other development.
  - Use on private property to enhance and expand Sage Grouse populations in suitable occupied and unoccupied habitat.
  - Reduces the likely hood that the Greater Sage-Grouse will be listed as endangered

### **The legislation provides for:**

- Local Sage Grouse eggs to be harvested by a certified game bird farm under the supervision of a wildlife biologist and Wyoming Game & Fish Department
- Specific qualifications for facilities to engage in Sage-Grouse production
- Biologically sound disease prevention and bio-security practices
- A four year window to allow certified game bird farms to attempt to raise a captive breeding population of Greater Sage-grouse.

### **Our requests to the Department of the Interior:**

1. Based upon the Secretary of Interiors Order No. 3353 reference in Section 4, paragraph (b) subsection (v) the, Interior department endorse Wyoming's efforts to

establish a captive breeding population of Greater Sage-grouse in its upcoming review.

2. Offer financial support to certified Game Bird Farms in Wyoming in their efforts to establish a captive breeding population of Greater Sage-grouse. We estimate it will cost approximately \$500,000 for each of the four years authorized to adequately test the plan to raise a breeding flock of Greater Sage-Grouse. If the Department would support the effort for 50% or more that would assure the success in fund raising.

#### About Diamond Wings Upland Game Birds LLC

Diamond Wings and its predecessor has raised or sold over 700,000 upland game birds since 1995. It has a record of success with each of the species it has raised including Chinese pheasants, Ringneck pheasants, Chukar partridge, French red-legged partridge, Hungarian partridges, Bobwhite Quail, Red quail and California Valley quail.

Diamond Wings believes it will qualify as a certified private game bird farm to attempt to raise the sage grouse. Diamond Wings is NPIP qualified and tests annually for Avian Influenza. Diamond Wings currently raises Ringneck Pheasants and Chukar Partridges.

Author: Diemer True  
Managing Member  
Diamond Wings Upland Game Birds LLC  
[Diemer@Wyodiamond.com](mailto:Diemer@Wyodiamond.com)

**From:** Samantha McDonald  
**To:** [casey\\_hammond@ios.doi.gov](mailto:casey_hammond@ios.doi.gov)  
**Cc:** [Diemer True](#)  
**Subject:** Captive Raising of Sage Grouse  
**Date:** Friday, July 14, 2017 11:16:49 AM

---

Casey,

Great seeing you earlier this week. I wanted to touch base with you in your capacity on the sage grouse review team. One of my members, Diemer True (based in Wyoming) is actively involved with the captive raising of sage grouse and he would like to see a reference to the merits of the program in the final report. Would you have some time to speak with Diemer (cc'd)? He may even come to D.C. for the meeting if you feel that is best or maybe you two could coordinate the next time you are out west.

Thanks in advance for your consideration of this request!

Best,

Sam

Samantha McDonald

Director of Government Relations

Independent Petroleum Association of America

(202)857-4722 / Visit IPAA <<http://www.ipaa.org/>> / Visit ESA Watch <<http://www.esawatch.org/>>

**From:** Williams, Timothy  
**To:** [smcdonald@ipaa.org](mailto:smcdonald@ipaa.org)  
**Subject:** Out of Office Re: sage grouse  
**Date:** Friday, July 14, 2017 11:19:25 AM

---

I will be out of the office and have limited internet access until July 16, 2017. Please feel free to email or call my Secretary Valerie Smith at (202) 208-1923 [Valerie\\_V\\_Smith@ios.doi.gov](mailto:Valerie_V_Smith@ios.doi.gov)

Thank you, Tim Williams

--

Department Of The Interior  
External and Intergovernmental Affairs  
Tim Williams  
Work: 202-208-1923  
[email:timothy\\_williams@ios.doi.gov](mailto:timothy_williams@ios.doi.gov)

**From:** Samantha McDonald  
**To:** [timothy\\_williams@ios.doi.gov](mailto:timothy_williams@ios.doi.gov)  
**Cc:** [Diemer True](#)  
**Subject:** sage grouse  
**Date:** Friday, July 14, 2017 11:19:29 AM

---

Tim,

I hope this note finds you well. I wanted to touch base with you in your capacity on the sage grouse review team. One of my members, Diemer True (based in Wyoming) is actively involved with the captive raising of sage grouse and he would like to see a reference to the merits of the program in the final report. Would you have some time to speak with Diemer (cc'd)? He may even come to D.C. for the meeting if you feel that is best or maybe you two could coordinate the next time you are out west.

Thanks in advance for your consideration of this request!

Best,

Sam

Samantha McDonald

Director of Government Relations

Independent Petroleum Association of America

(202)857-4722 / Visit IPAA <<http://www.ipaa.org/>> / Visit ESA Watch <<http://www.esawatch.org/>>

**From:** Casey Hammond  
**To:** [Samantha McDonald](#)  
**Cc:** [Diemer True](#); [Roslyn Sellars](#); [Thomas Irwin](#)  
**Subject:** Re: Captive Raising of Sage Grouse  
**Date:** Friday, July 14, 2017 3:17:10 PM

---

Happy to talk. Let's set up a time for a call.

On Jul 14, 2017, at 11:16 AM, Samantha McDonald <[SMcDonald@ipaa.org](mailto:SMcDonald@ipaa.org)> wrote:

Casey,

Great seeing you earlier this week. I wanted to touch base with you in your capacity on the sage grouse review team. One of my members, Diemer True (based in Wyoming) is actively involved with the captive raising of sage grouse and he would like to see a reference to the merits of the program in the final report. Would you have some time to speak with Diemer (cc'd)? He may even come to D.C. for the meeting if you feel that is best or maybe you two could coordinate the next time you are out west.

Thanks in advance for your consideration of this request!

Best,

Sam

Samantha McDonald

Director of Government Relations

Independent Petroleum Association of America

(202)857-4722 / Visit IPAA <<http://www.ipaa.org/>> / Visit ESA Watch <<http://www.esawatch.org/>>

<image001.jpg>

**From:** Williams, Timothy  
**To:** [Samantha McDonald; Diemer@wyodiamond.com](mailto:Samantha.McDonald@wyodiamond.com)  
**Subject:** Re: sage grouse  
**Date:** Friday, July 14, 2017 5:01:23 PM

---

I would like to speak with him. I can meet him either in DC or at our next meeting. I believe our next meeting will be out west.

Tim Williams

On Fri, Jul 14, 2017 at 11:18 AM, Samantha McDonald <[SMcDonald@ipaa.org](mailto:SMcDonald@ipaa.org)> wrote:

Tim,

I hope this note finds you well. I wanted to touch base with you in your capacity on the sage grouse review team. One of my members, Diemer True (based in Wyoming) is actively involved with the captive raising of sage grouse and he would like to see a reference to the merits of the program in the final report. Would you have some time to speak with Diemer (cc'd)? He may even come to D.C. for the meeting if you feel that is best or maybe you two could coordinate the next time you are out west.

Thanks in advance for your consideration of this request!

Best,

Sam

Samantha McDonald

Director of Government Relations

Independent Petroleum Association of America

(202)857-4722 / Visit IPAA <<http://www.ipaa.org/>> / Visit ESA Watch <<http://www.esawatch.org/>>

--

**From:** [casey\\_hammond@ios.doi.gov](mailto:casey_hammond@ios.doi.gov)  
**To:** [smcdonald@ipaa.org](mailto:smcdonald@ipaa.org)  
**Subject:** Invitat on: Phone ca l re: Greater Sage-grouse (Casey Hammond & IPAA) ... @ Wed Jul 19, 2017 3pm - 3:30pm (EDT) (smcdonald@ipaa.org)  
**Attachments:** [inv\\_te\\_ks](#)

more details => <[https://www.google.com/calendar/event?action=VIEW&eid=NGZwbHFvZmdxbGk1cWowdmZnNmoXNzJlZGMgc21jZG9uYWskQGhwYWUub3Jn&tok=MjUjY2FzZXI0aG9uZEBpb3MuZG9pLmdvdjVhNWVIMGY1OGM1ZGVlZDQ2NWRkZTQ1YjJ0DE3ZmNkYmNmNDQ0NmU&ctz=America/New\\_York&hl=en](https://www.google.com/calendar/event?action=VIEW&eid=NGZwbHFvZmdxbGk1cWowdmZnNmoXNzJlZGMgc21jZG9uYWskQGhwYWUub3Jn&tok=MjUjY2FzZXI0aG9uZEBpb3MuZG9pLmdvdjVhNWVIMGY1OGM1ZGVlZDQ2NWRkZTQ1YjJ0DE3ZmNkYmNmNDQ0NmU&ctz=America/New_York&hl=en)>

Phone call re: Greater Sage-grouse (Casey Hammond & IPAA) -- Dial: 866-747-1718, Code: 2084545  
When Wed Jul 19, 2017 3pm - 3:30pm Eastern Time

Video call  

Calendar [smcdonald@ipaa.org](mailto:smcdonald@ipaa.org)  
Who • [casey\\_hammond@ios.doi.gov](mailto:casey_hammond@ios.doi.gov) - organizer  
• [roslyn\\_sellers@fw.gov](mailto:roslyn_sellers@fw.gov) - creator  
• [diener@wyodiadiamond.com](mailto:diener@wyodiadiamond.com)  
• [smcdonald@ipaa.org](mailto:smcdonald@ipaa.org)

Going? Yes <[https://www.google.com/calendar/event?action=RESPOND&eid=NGZwbHFvZmdxbGk1cWowdmZnNmoXNzJlZGMgc21jZG9uYWskQGhwYWUub3Jn&rst=1&tok=MjUjY2FzZXI0aG9uZEBpb3MuZG9pLmdvdjVhNWVIMGY1OGM1ZGVlZDQ2NWRkZTQ1YjJ0DE3ZmNkYmNmNDQ0NmU&ctz=America/New\\_York&hl=en](https://www.google.com/calendar/event?action=RESPOND&eid=NGZwbHFvZmdxbGk1cWowdmZnNmoXNzJlZGMgc21jZG9uYWskQGhwYWUub3Jn&rst=1&tok=MjUjY2FzZXI0aG9uZEBpb3MuZG9pLmdvdjVhNWVIMGY1OGM1ZGVlZDQ2NWRkZTQ1YjJ0DE3ZmNkYmNmNDQ0NmU&ctz=America/New_York&hl=en)>  
- Maybe <[https://www.google.com/calendar/event?action=RESPOND&eid=NGZwbHFvZmdxbGk1cWowdmZnNmoXNzJlZGMgc21jZG9uYWskQGhwYWUub3Jn&rst=3&tok=MjUjY2FzZXI0aG9uZEBpb3MuZG9pLmdvdjVhNWVIMGY1OGM1ZGVlZDQ2NWRkZTQ1YjJ0DE3ZmNkYmNmNDQ0NmU&ctz=America/New\\_York&hl=en](https://www.google.com/calendar/event?action=RESPOND&eid=NGZwbHFvZmdxbGk1cWowdmZnNmoXNzJlZGMgc21jZG9uYWskQGhwYWUub3Jn&rst=3&tok=MjUjY2FzZXI0aG9uZEBpb3MuZG9pLmdvdjVhNWVIMGY1OGM1ZGVlZDQ2NWRkZTQ1YjJ0DE3ZmNkYmNmNDQ0NmU&ctz=America/New_York&hl=en)>  
- No <[https://www.google.com/calendar/event?action=RESPOND&eid=NGZwbHFvZmdxbGk1cWowdmZnNmoXNzJlZGMgc21jZG9uYWskQGhwYWUub3Jn&rst=2&tok=MjUjY2FzZXI0aG9uZEBpb3MuZG9pLmdvdjVhNWVIMGY1OGM1ZGVlZDQ2NWRkZTQ1YjJ0DE3ZmNkYmNmNDQ0NmU&ctz=America/New\\_York&hl=en](https://www.google.com/calendar/event?action=RESPOND&eid=NGZwbHFvZmdxbGk1cWowdmZnNmoXNzJlZGMgc21jZG9uYWskQGhwYWUub3Jn&rst=2&tok=MjUjY2FzZXI0aG9uZEBpb3MuZG9pLmdvdjVhNWVIMGY1OGM1ZGVlZDQ2NWRkZTQ1YjJ0DE3ZmNkYmNmNDQ0NmU&ctz=America/New_York&hl=en)>  
more options => <[https://www.google.com/calendar/event?action=VIEW&eid=NGZwbHFvZmdxbGk1cWowdmZnNmoXNzJlZGMgc21jZG9uYWskQGhwYWUub3Jn&tok=MjUjY2FzZXI0aG9uZEBpb3MuZG9pLmdvdjVhNWVIMGY1OGM1ZGVlZDQ2NWRkZTQ1YjJ0DE3ZmNkYmNmNDQ0NmU&ctz=America/New\\_York&hl=en](https://www.google.com/calendar/event?action=VIEW&eid=NGZwbHFvZmdxbGk1cWowdmZnNmoXNzJlZGMgc21jZG9uYWskQGhwYWUub3Jn&tok=MjUjY2FzZXI0aG9uZEBpb3MuZG9pLmdvdjVhNWVIMGY1OGM1ZGVlZDQ2NWRkZTQ1YjJ0DE3ZmNkYmNmNDQ0NmU&ctz=America/New_York&hl=en)>  
Invitation from Google Calendar <<https://www.google.com/calendar/>>  
You are receiving this courtesy email at the account [smcdonald@ipaa.org](mailto:smcdonald@ipaa.org) because you are an attendee of this event.  
To stop receiving future updates for this event, decline this event. Alternatively you can sign up for a Google account at <https://www.google.com/calendar/> and control your notification settings for your entire calendar.  
Forwarding this invitation could allow any recipient to modify your RSVP response. Learn More <<https://support.google.com/calendar/answer/37135#forwarding>> .

**From:** Diemer True  
**To:** ["vincent\\_devito@ios.doi.gov"](mailto:vincent_devito@ios.doi.gov)  
**Subject:** FW: Captive raising of Greater Sage-grouse  
**Date:** Friday, July 21, 2017 9:49:58 PM  
**Attachments:** [enrolled act 91.pdf](#)  
[Talking Points for Vince DeVito.docx](#)

---

From: Diemer True  
Sent: Friday, July 21, 2017 2:59 PM  
To: 'vincent\_devito@ios.doi.gov' <vincent\_devito@ios.doi.gov>  
Subject: Captive raising of Greater Sage-grouse

Good afternoon Mr. DeVito,

Here is the briefing paper on Wyoming's captive breeding initiative and the enabling legislation.

If the Interior Department review could give encouragement to the Wyoming initiative, I think it would give us a boost and momentum.

Please let me know if I can be of additional help or answer any question.

Best regards

Diemer True

**From:** Timothy Williams  
**To:** [Samantha McDonald](mailto:Samantha.McDonald@ipaa.org)  
**Subject:** Re: Sage Grouse Call Request  
**Date:** Tuesday, July 25, 2017 4:01:14 PM

---

That works. It's on my calendar.

Tim

Timothy Williams  
External and Intergovernmental Affairs  
Department of the Interior  
Cell: (202) 706-4982

On Jul 25, 2017, at 3:58 PM, Samantha McDonald <[SMcDonald@ipaa.org](mailto:SMcDonald@ipaa.org)> wrote:

Let's just use my call in if that's ok. I don't know if I can make it over to DOI in time.

Dial in: (866) 906-0123  
Passcode: 8162862#

**From:** Williams, Timothy [[mailto:timothy\\_williams@ios.doi.gov](mailto:timothy_williams@ios.doi.gov)]  
**Sent:** Tuesday, July 25, 2017 3:56 PM  
**To:** Samantha McDonald <[SMcDonald@ipaa.org](mailto:SMcDonald@ipaa.org)>  
**Subject:** Re: Sage Grouse Call Request

Yes, lets use your call in or you can come over to my office. What ever works for you all.

Tim Williams

On Tue, Jul 25, 2017 at 3:46 PM, Samantha McDonald <[SMcDonald@ipaa.org](mailto:SMcDonald@ipaa.org)> wrote:

I've got most folks available at 1:30PM on Thursday. Do you want to use my call in?  
Please advise.

**From:** Williams, Timothy [[mailto:timothy\\_williams@ios.doi.gov](mailto:timothy_williams@ios.doi.gov)]  
**Sent:** Tuesday, July 25, 2017 10:12 AM  
**To:** Samantha McDonald <[SMcDonald@ipaa.org](mailto:SMcDonald@ipaa.org)>  
**Subject:** Re: Sage Grouse Call Request

Wednesday 12:00 - 1:00 pm  
Thursday 12:30 - 5:30 I am open.

If you want to provide the conference line that would be great.

Tim

On Tue, Jul 25, 2017 at 10:08 AM, Samantha McDonald <[SMcDonald@ipaa.org](mailto:SMcDonald@ipaa.org)> wrote:

Could you provide a couple of times that work for you Wednesday and/or Thursday and I'll see where we can get the most people available. I can provide a call-in number, if that makes your life easier. (The CHK folks are in Oklahoma City, the rest are in Denver, I'm obviously in DC).

**From:** Williams, Timothy [mailto:[timothy\\_williams@ios.doi.gov](mailto:timothy_williams@ios.doi.gov)]

**Sent:** Tuesday, July 25, 2017 10:01 AM

**To:** Samantha McDonald <[SMcDonald@ipaa.org](mailto:SMcDonald@ipaa.org)>

**Subject:** Re: Sage Grouse Call Request

I am back. What time works for you?

Tim Williams

On Tue, Jul 25, 2017 at 9:54 AM, Samantha McDonald <[SMcDonald@ipaa.org](mailto:SMcDonald@ipaa.org)> wrote:

Hi Tim!

Hope you had a great week out west and have safely returned to D.C. Were you able to find a time to chat with some of us on a sage grouse map issue?

Sam

---

**From:** Samantha McDonald

**Sent:** Tuesday, July 18, 2017 2:39 PM

**To:** [timothy\\_williams@ios.doi.gov](mailto:timothy_williams@ios.doi.gov)

**Cc:** 'Tripp Parks' <[tparks@westernenergyalliance.org](mailto:tparks@westernenergyalliance.org)>; 'Brian Woodard' <[brian.woodard2@chk.com](mailto:brian.woodard2@chk.com)>; [Spencer\\_Kimball@eogresources.com](mailto:Spencer_Kimball@eogresources.com); 'Kari Smith' <[Kari.Smith@conocophillips.com](mailto:Kari.Smith@conocophillips.com)>

**Subject:** Sage Grouse Call Request

Tim,

Could I request one more call with you in your sage grouse review capacity? We have three companies (Chesapeake, Conoco Phillips and EOG Resources and the fellow trade association Western Energy Alliance) cc'd that would like to chat with you on a pretty specific sage grouse issue they'd like to have addressed in the final report. While the companies can provide more background in addition to what I have pasted below, essentially we need the

Department to issue guidance to BLM concerning an expedited approach to accept Version 4 Core Area Maps within their planning purposes. To ignore the problem could potential jeopardize several dozen projects in Wyoming. Thanks for your consideration of this request.

Kind regards,

Sam  
-----

**Background:** On July 29, 2015, the State of Wyoming issued Executive Order 2015-4 which replaced Executive Orders 2011-5 and 2013-3 concerning Greater Sage-grouse (GrSG) management and mitigation practices within Wyoming. EO 2015-4 utilized Version 4 of the State's GrSG Core Area Maps, which were attached to the referenced EO. BLM WY had previously issued Resource Management Plans (RMPs) providing direction on conservation goals, objectives, allocations and management actions in GrSG habitat including core areas and that those RMPs are based upon Version 3 of the State's Core Area Map. BLM recognizes that EO 2015-4 utilizes a newer version of the State's Core Area Map (Version 4) which does not align completely with the areas identified in the Version 3 maps that served as the basis for BLM's Priority Habitat Management Areas (PHMAs) identified in the RMPs.

**Issue:** The BLM has determined that based on its Planning Regulations (43 CFR 1610) a Land Use Plan Amendment process is required for the BLM WY to consider incorporation of Version 4 of the Core Area Maps into the applicable RMPs. Within their IM No. WY-2016-024, the WY State Director's office has directed all Field Offices (FOs) for those lands no longer identified as Core Areas (Version 4) by the State of Wyoming's Core Area Protection Strategy (EO 2015-4) but which were initially identified as Priority Habitat Management Areas (PHMA) in the GrSG Amended RMPs as Core Areas subject to all applicable requirements until a subsequent planning process is completed. Further, the IM noted, that until a subsequent plan amendment is completed, the BLM will evaluate all proposed activities in these areas to determine the appropriate restrictions to be applied through the action-specific NEPA analysis and that all FO's will initiate a DDCT analysis in accordance with the procedures outlined on the WGFD website and will have a technical review completed.

**Context:** WY BLM State Director, Mary Jo Rugwell, recognizes that changes are needed to address this problem but says she needs guidance from BLM HQ. Operators working to obtain APDs in areas which were initially identified as core within V3 but no longer are in core per V4, have been instructed to include core area Required Design Features (RDFs) in their applications or they won't be approved. We have also been told to adhere to the 5% disturbance thresholds

or our permits will likely be deferred. Once the projects are approved, we will need to go in on a well by well basis to apply for exceptions. Planning is difficult since we can't assume the exceptions will be granted. The costs associated with in-core (PHMA) RDFs and non-core (GHMA) RDFs significantly differ. We have also been instructed to complete Density Disturbance Calculations (DDCTs) on the areas. When we do this, WY Game and Fish Department (WGFD) is stating that this is an unnecessary practice as our proposed projects are not in core areas (as they are using the V4 maps and BLM is using the V3 maps). We have also been asked, via BLM, to consult with WGFD on projects and then have subsequently been informed by the WGFD that their consultation is unwarranted as they projects do not fall within the V4 core boundaries. This issue is creating uncertainty for the business which results in confusion and delays.

**Specific Ask:** The WY State BLM and associated FO's need guidance from HQ concerning an expedited approach to accept the V4 Core Area Maps within their planning processes. Now is the time to address this issue while Sec. Zinke has constituted a GrSG Review Team looking to make recommendations by 8/7.

**Samantha McDonald**

Director of Government Relations  
Independent Petroleum Association of America  
(202)857-4722 / [Visit IPAA](#) / [Visit ESA Watch](#)  
<image001.jpg>

--

**Department Of The Interior**

External and Intergovernmental Affairs

Tim Williams

Work: 202-208-1923

email:[timothy\\_williams@ios.doi.gov](mailto:timothy_williams@ios.doi.gov)

--

**Department Of The Interior**

External and Intergovernmental Affairs

Tim Williams

Work: 202-208-1923  
email:[timothy\\_williams@ios.doi.gov](mailto:timothy_williams@ios.doi.gov)

--

**Department Of The Interior**

External and Intergovernmental Affairs

Tim Williams

Work: 202-208-6015

email:[timothy\\_williams@ios.doi.gov](mailto:timothy_williams@ios.doi.gov)

**From:** Samantha McDonald  
**To:** [Williams, Timothy](mailto:Williams.Timothy)  
**Subject:** Re: Sage Grouse Call Request  
**Date:** Thursday, August 17, 2017 4:17:47 PM

---

Great! Thank you!

Sent from my iPhone

On Aug 17, 2017, at 4:12 PM, Williams, Timothy <[timothy\\_williams@ios.doi.gov](mailto:timothy_williams@ios.doi.gov)> wrote:

We are working on it. I have let the Secretary know as well.

Tim

On Thu, Aug 17, 2017 at 4:02 PM, Samantha McDonald <[SMcDonald@ipaa.org](mailto:SMcDonald@ipaa.org)> wrote:

Tim, Has BLM been able to resolve this map discrepancy in Wyoming yet? I appreciate any update you may have.

Sam

---

**From:** Samantha McDonald  
**Sent:** Tuesday, July 18, 2017 2:39 PM  
**To:** [timothy\\_williams@ios.doi.gov](mailto:timothy_williams@ios.doi.gov)  
**Cc:** 'Tripp Parks' <[tparks@westernenergyalliance.org](mailto:tparks@westernenergyalliance.org)>; 'Brian Woodard' <[brian.woodard2@chk.com](mailto:brian.woodard2@chk.com)>; [Spencer\\_Kimball@eogresources.com](mailto:Spencer_Kimball@eogresources.com); 'Kari Smith' <[Kari.Smith@conocophillips.com](mailto:Kari.Smith@conocophillips.com)>  
**Subject:** Sage Grouse Call Request

Tim,

Could I request one more call with you in your sage grouse review capacity? We have three companies (Chesapeake, Conoco Phillips and EOG Resources and the fellow trade association Western Energy Alliance) cc'd that would like to chat with you on a pretty specific sage grouse issue they'd like to have addressed in the final report. While the companies can provide more background in addition to what I have pasted below, essentially we need the Department to issue guidance to BLM concerning an expedited approach to accept Version 4 Core Area Maps within their planning purposes. To ignore the problem could potential jeopardize several dozen projects in Wyoming. Thanks for your consideration of this

**From:** Williams, Timothy  
**To:** [Samantha McDonald](mailto:Samantha.McDonald)  
**Subject:** Re: Sage Grouse Call Request  
**Date:** Tuesday, July 25, 2017 10:01:55 AM

---

I am back. What time works for you?

Tim Williams

On Tue, Jul 25, 2017 at 9:54 AM, Samantha McDonald <[SMcDonald@ipaa.org](mailto:SMcDonald@ipaa.org)> wrote:

Hi Tim!

Hope you had a great week out west and have safely returned to D.C. Were you able to find a time to chat with some of us on a sage grouse map issue?

Sam

---

**From:** Samantha McDonald  
**Sent:** Tuesday, July 18, 2017 2:39 PM  
**To:** [timothy\\_williams@ios.doi.gov](mailto:timothy_williams@ios.doi.gov)  
**Cc:** 'Tripp Parks' <[tparks@westernenergyalliance.org](mailto:tparks@westernenergyalliance.org)>; 'Brian Woodard' <[brian.woodard2@chk.com](mailto:brian.woodard2@chk.com)>; [Spencer\\_Kimball@eogresources.com](mailto:Spencer_Kimball@eogresources.com); 'Kari Smith' <[Kari.Smith@conocophillips.com](mailto:Kari.Smith@conocophillips.com)>  
**Subject:** Sage Grouse Call Request

Tim,

Could I request one more call with you in your sage grouse review capacity? We have three companies (Chesapeake, Conoco Phillips and EOG Resources and the fellow trade association Western Energy Alliance) cc'd that would like to chat with you on a pretty specific sage grouse issue they'd like to have addressed in the final report. While the companies can provide more background in addition to what I have pasted below, essentially we need the Department to issue guidance to BLM concerning an expedited approach to accept Version 4 Core Area Maps within their planning purposes. To ignore the problem could potential jeopardize several dozen projects in Wyoming. Thanks for your consideration of this request.

Kind regards,



Claypool, Larry &lt;lclaypoo@blm.gov&gt;

## Re: SO 3353 next steps

1 message

**Timothy Murphy** <tmurphy@blm.gov>

Tue, Jun 20, 2017 at 4:07 AM

To: "Kelleher, Karen" <kkelleh@blm.gov>

Cc: Jon Raby <jraby@blm.gov>, Mary Jo Rugwell <mrugwell@blm.gov>, Ruth Welch <rwelch@blm.gov>, Edwin Roberson <eroberso@blm.gov>, "Pool, Jamie" <jpool@blm.gov>, Jerome Perez <jperez@blm.gov>, Marci Todd <m1todd@blm.gov>, Richard Hotaling <rhotalin@blm.gov>, Larry Claypool <lclaypoo@blm.gov>, "Brian (W) Davis" <bdavis@blm.gov>, Gregory Shoop <gshoop@blm.gov>, Anita Bilbao <abilbao@blm.gov>, Peter Ditton <pditton@blm.gov>, Theresa Hanley <thanley@blm.gov>, Joseph Stout <j2stout@blm.gov>, Paul Petersen <ppeterse@blm.gov>, Brian St George <bstgeorg@blm.gov>, "Jossie, Abbie E" <ajossie@blm.gov>, June Shoemaker <jshoemaker@blm.gov>, Kathryn Stangl <kstangl@blm.gov>, Danielle Chi <dchi@blm.gov>, Raul Morales <raul\_morales@blm.gov>, Buddy Green <bwgreen@blm.gov>, Sandra Leach <ssleach@blm.gov>, "Bail, Kristin" <kbail@blm.gov>, John Ruhs <jruhs@blm.gov>, Kathleen Benedetto <kathleen\_benedetto@ios.doi.gov>, Timothy Spisak <tspisak@blm.gov>, Lonny Bagley <lbagley@blm.gov>, Howard Cantor <hcantor@blm.gov>, Howard Hedrick <hhedrick@blm.gov>, Patrick Wilkinson <p2wilkin@blm.gov>, "Krauss, Jeff" <jkrauss@blm.gov>, Todd Yeager <tyeager@blm.gov>, Gordon Toevs <gtoevs@blm.gov>, "Munson, Johanna" <jmunson@blm.gov>, "Valori (Lori) Armstrong" <vaarmstrong@blm.gov>, Quincy Bahr <qfbahr@blm.gov>, Sarah Shattuck <sarah.shattuck@sol.doi.gov>, Aaron Moody <aaron.moody@sol.doi.gov>, "Melvin (Joe) Tague" <jtague@blm.gov>, Jolie Pollet <jpollet@blm.gov>, "Rodney (Rick) Belger" <rbelger@blm.gov>, "Brown, Laura" <laura.brown@sol.doi.gov>, "Herren, Vicki" <vherren@blm.gov>, "Prentice, Karen" <kprentic@blm.gov>, Ryan Hathaway <rhathaway@blm.gov>, Stephen Small <ssmall@blm.gov>, Tamala DeFries <tdefries@blm.gov>, Grant Beebe <gbeebe@blm.gov>, Nicole Alt <nicole\_alt@fws.gov>, Steve Hanser <shanser@usgs.gov>, Heather Feeney <hfeeney@blm.gov>, Jonathan Beck <jmbeck@blm.gov>, "Trettin, Diana" <dtrettin@blm.gov>

A further tightening of the schedule leaves no freeboard for adjustment of any kind involving development, partner coordination, or logistics. Planning for staff to conduct weekend work is not a good idea. Idaho prefers the current schedule.

Thanks, Tim

On Jun 19, 2017, at 4:58 PM, Kelleher, Karen <kkelleh@blm.gov> wrote:

Good Afternoon/Evening State Directors and others,

GRSG Secretarial Order core team members have heard that **several states (so far MT, WY, and CO) have indicated they will not be able to or unlikely to send representatives to a meeting June 27-29** due to conflicts with WGA. Since one of the main purposes of the SO is to enhance cooperation with the 11 States, it seems undesirable to schedule a meeting when they are not available. **Our alternative dates for this face-to-face meeting would be July 11-13.** However, these dates are not perfect either – July 11 coincides with the last day of the WAFWA meeting, which ends at midday Tuesday July 11. **Waiting to hold the face to face meeting until the week of July 11 also greatly shortens the review timeline** - .e.g., instead of SGTF, you, and the DOI Review Team having a full week to review the draft report, they and you would have only 5 calendar days - including a weekend. We would also likely be asking core team members to work during some weekends.

Before changing the dates, we would like to hear from you (and your state contacts if possible) on whether July 11-13 would be better and whether a tradeoff of less review time is acceptable. Please see attached the alternative schedule. **Please give us any feedback you have on the July 11-13 alternatives dates by tomorrow, Tuesday 6/20 at noon. I apologize for the short-time line, but if we stick with next week, we have to make that decision tomorrow.**

Further information:

**Timothy Murphy and Karen Kelleher Emails**

If we have the meeting next week, it would be in Salt Lake City – there is no availability in Denver. If we move to the week of July 10, we believe we will be able to find space in Denver.

With regards to the WAFWA overlap in the week of July 10, we could adjust the agenda of the meeting to discuss the wildlife biology topic either late on July 11 or on July 12 to accommodate people who are coming from WAFWA (they are meeting in Vail), but would strongly prefer not to delay the overall start of the meeting.

We are exploring having an executives update on the afternoon/early evening of July 12, which we hope would allow most of you to attend at the conclusion of the ELT and before heading home. This would also give the team an opportunity to do some preliminary work in response to your feedback on the morning of July 13 before they leave.

If we move to the week of July 11, we would ask that feedback from you and the subgroups on the various topics be provided to the core team by June 30 (one additional week).

On Thu, Jun 15, 2017 at 8:04 PM, Kelleher, Karen <kkelleh@blm.gov> wrote:

Hello State Directors and everyone else,

To assist you in **gathering information from your States** and to assist us in using that information to analyze options and develop recommendations for inclusion in the SO 3353 report, we have developed a **template** (attached) for your use. This will GREATLY help the team to pull together the information you gather from the 11 states. We are asking that you work with your respective Governor's offices to gather as much information as possible and **submit it to the core team by 6/23**. Please contact Todd, Lori, Johanna, or Gordon with questions on the template.

We would also like **a list of BLM-state MOUs related to GRSG** - plan implementation, data sharing, mitigation, and any others. We are interested in whether you have signed MOUs, you are working on MOUs, or you don't have MOUs; as well as whether your discussions with the states indicate the need for additional MOUs or revisions to existing MOUs.

In addition to the state-by-state work that you are conducting, we have 3 additional subgroups working on a range-wide basis on fire and invasives/IRFMS; science and data (led by USGS); and wildlife/things to benefit the bird (led by USFWS) - more information on these subgroups soon, but if you have staff that you believe could contribute to any of these subgroups, please let us know and we will share those names with the leads.

Core team  
Karen Kelleher (IC)  
Todd Yaeger (Project Lead)  
Gordon Toevs  
Lori Armstrong  
Johanna Munson  
Quincy Bahr (planning)

**TBD (public affairs) - still looking for a name would appreciate your assistance.**

Could each of you please **provide the name of the SO3353 BLM contact(s) for your state to Todd**. These people, along with representatives from USGS, FWS, and SGTF will make up an "extended core team". Todd will provide contact information for the core & extended core teams to all SDs and DSDs.

We are working to schedule a **face-to-face team federal/state meeting June 27-29** (executives particularly invited for the morning of June 29 for a report out on the team's recommendations but welcome at any time). Agenda and more information on this meeting to come shortly.

Members for the DOI Sage Grouse Review Team called for in SO3353 are currently being identified and will be shared as soon as they are available - for BLM the team members are John & Kathy.

The Department is also identifying names and contacts in the Governor's office that you should please contact - most states have already responded - see list attached. Jamie & Jerry - OR & CA have not yet identified names, but given the very, very short timeline, I encourage you to reach out to the Governor's offices.

Thank you for your assistance,  
Karen

--

Karen Kelleher

Deputy Assistant Director - Resources and Planning

Main Interior room 5646

kkelleh@blm.gov

202-208-4896

--

Karen Kelleher

Deputy Assistant Director - Resources and Planning

Main Interior room 5646

kkelleh@blm.gov

202-208-4896

<GRSG2.0\_Timeline\_alternative.xlsx>

**From:** Bobbie  
**To:** [Aurelia Skipwith](#); [Alan Olson](#)  
**Cc:** [timothy\\_williams@ios.doi.gov](mailto:timothy_williams@ios.doi.gov)  
**Subject:** Brief Bio and Headshot for the Program  
**Date:** Tuesday, August 01, 2017 12:42:40 PM  
**Attachments:** [image001.png](#)

---

Good morning Mr. Williams,

We are happy you are able to attend MPA's upcoming Annual Meeting August 29-30. Would it be possible to email us a brief bio and a headshot for the program?

Thank you for your help, and we are looking forward to meeting you soon,

Bobbie Gardner, office manager

Montana Petroleum Association

PO Box 1186

Helena, MT 59624

406-442-7582

[www.montanapetroleum.org](http://www.montanapetroleum.org) <<http://www.montanapetroleum.org>>

<<http://www.montanapetroleum.org>>

From: Aurelia Skipwith [[mailto:aurelia\\_skipwith@ios.doi.gov](mailto:aurelia_skipwith@ios.doi.gov)]  
Sent: Saturday, July 29, 2017 2:28 PM  
To: Bobbie; Alan Olson  
Cc: [timothy\\_williams@ios.doi.gov](mailto:timothy_williams@ios.doi.gov)  
Subject: Re: Nice to Meet You

Alan and Bobbie,

Timothy Williams, our Deputy Director for External/ Intergovernmental Affairs, is able to attend and he's cc'ed.

Tim,

They mentioned that it would be nice to hear about how things are going with land and minerals as well as sage grouse issues. If you need more details, you can call Alan at 406-320-1385 or email.

Aurelia Skipwith  
Deputy Assistant Secretary  
for Fish and Wildlife and Parks

U.S. Department of Interior  
1849 C Street NW, Room 3148  
Washington, DC 20240  
202-208-5837

On Jul 17, 2017, at 10:51 AM, Bobbie <bobbie@montanapetroleum.org> wrote:

Good morning Aurelia,

I have attached a complimentary registration to the Barbeque (Tuesday, August 29th) and Annual Meeting (Wednesday, August 30th). We also have a golf tournament on Tuesday starting at 12:15pm, and a fishing tournament on Tuesday if you are interested.

Thank you, and please don't hesitate to contact us with any questions,

Bobbie Gardner, office manager

Montana Petroleum Association

PO Box 1186

Helena, MT 59624

406-442-7582

www montanapetroleum.org <<http://www.montanapetroleum.org/>>

<<http://www.montanapetroleum.org/>>

From: Aurelia Skipwith [[mailto:aurelia\\_skipwith@ios.doi.gov](mailto:aurelia_skipwith@ios.doi.gov)]  
Sent: Saturday, July 15, 2017 8:44 AM  
To: Alan Olson  
Cc: Bobbie  
Subject: Re: Nice to Meet You

Hi Alan,

It was a pleasure to meet you as well. Please provide me with an agenda and the dates of your annual meeting. Thank you.

Aurelia Skipwith

Deputy Assistant Secretary

for Fish and Wildlife and Parks

U.S. Department of Interior

1849 C Street NW, Room 3148

Washington, DC 20240

202-208-5837

On Jun 29, 2017, at 10:33 AM, Alan Olson <Alan@montanapetroleum.org> wrote:

Aurelia,

It was a pleasure meeting you last Tuesday. Thank you for taking time to come to Montana and visit with us about the issues.

As I mentioned Tuesday, if you could find time to get away we would like to invite you to participate at our annual meeting in Billings, Montana on Wednesday, August 30th to discuss federal issues that affect our industry, primarily sage grouse for this particular discussion.

Thank you,

Alan

Ps. tell Leo hi for me.

From: Skipwith, Aurelia [[mailto:aurelia\\_skipwith@ios.doi.gov](mailto:aurelia_skipwith@ios.doi.gov)]

Sent: Wednesday, June 28, 2017 7:55 PM

To: Alan Olson <Alan@montanapetroleum.org>

Subject: Nice to Meet You

Hi Alan,

It was a pleasure to meet you. Please let me know if I can be of assistance.

Regards,

Aurelia Skipwith

Deputy Assistant Secretary

for Fish and Wildlife and Parks

U.S. Department of Interior

1849 C Street, NW, Room 3148

Washington, DC 20240

(202) 208-5837

<MPA Annual Meeting Registration - Complimentary.pdf>

<MPA Petroleum Industry Appreciation Day Luncheon Flyer.pdf>

<MPA Golf Registration.pdf>

<MPA Fishing Derby Registration.pdf>

**From:** Tripp Parks  
**To:** [Williams, Timothy](mailto:Williams.Timothy); [vincent\\_devito@ios.doi.gov](mailto:vincent_devito@ios.doi.gov); [casey\\_hammond@ios.doi.gov](mailto:casey_hammond@ios.doi.gov); [kathy\\_benedetto@ios.doi.gov](mailto:kathy_benedetto@ios.doi.gov); [katharine\\_macgregor@ios.doi.gov](mailto:katharine_macgregor@ios.doi.gov); [daniel\\_jorjani@ios.doi.gov](mailto:daniel_jorjani@ios.doi.gov); [scott\\_cameron@ios.doi.gov](mailto:scott_cameron@ios.doi.gov)  
**Cc:** [Kathleen Sgamma](mailto:Kathleen.Sgamma); [Sumner, Bret](mailto:Sumner.Bret); [Sauer, Theresa](mailto:Sauer.Theresa)  
**Subject:** Western Energy Alliance Letter on the Economic Impact of the Sage Grouse Land Use Plans  
**Date:** Wednesday, July 19, 2017 7:36:05 PM  
**Attachments:** [Western Energy Alliance Letter to Interior re GrSG Economic Impact.pdf](#)

---

Good evening,

Attached please find a letter from Western Energy Alliance to the Sage Grouse Review Team regarding the economic impacts of the Greater Sage-Grouse land use plans. We appreciate your review of these plans and would be happy to provide any additional information you may need. Please don't hesitate to contact us with any questions.

Sincerely,

Tripp Parks

Manager of Government Affairs

Western Energy Alliance

Main: 303-623-0987

Direct: 303-501-1061

[tparks@westernenergyalliance.org](mailto:tparks@westernenergyalliance.org)



July 19, 2017

*Via Electronic Mail and Overnight Delivery*

Greater Sage Grouse Review Team  
U.S. Department of the Interior  
1849 C Street, NW  
Washington D.C. 20240

**Re: Economic Impacts of Greater Sage Grouse Federal Land Use Plans**

Dear Review Team:

Western Energy Alliance (the Alliance) submits this letter and information for your consideration during your review of the greater sage-grouse (GrSG) federal land use plans pursuant to Secretarial Order 3349.

The Alliance represents over 300 companies engaged in all aspects of environmentally responsible exploration and production of oil and natural gas across the West. Alliance members are independents, the majority of which are small businesses with an average of fifteen employees. Our industry plays an important role in the economic wellbeing of the western States, and our production is a strong contributor toward American energy security.

The oil and natural gas industry generates approximately 173,860 jobs in the 13 western states, and approximately 62% of these jobs (107,700) are located in four states where greater sage grouse are found: Montana, Colorado, Wyoming, and Utah.

The economic benefits of oil and gas production in the West are significant. Western producers are proud to provide 21% of the nation's oil and 25% of natural gas production while impacting less than 0.07 percent of public lands. Our industry generates \$84.3 billion in annual economic impact nationwide, and in 2016 the industry contributed \$13.3 billion in taxes to local, state and federal governments. Onshore producers return \$54.12 in royalties and lease revenues for each dollar spent by the government administering the federal onshore program.

**Economic Impact.** The 2015 GrSG federal land use plans are severely restrictive and have tremendous detrimental economic and job impacts to the oil and gas industry. An economic analysis by John Dunham & Associates (JDA) reports that these restrictions will result in:

- loss of approximately 9,276 oil and gas jobs;
- reduced annual economic growth of approximately \$2.4 billion; and,

- loss of annual federal and state tax revenues of approximately \$351 million.<sup>1</sup>

This analysis utilized the IMPLAN model. A copy of this economic analysis is attached.

In the West, states and counties rely on a healthy and robust oil and natural gas industry to balance state budgets and fund education, public safety, and infrastructure projects. Most states require companies to pay severance, property, and other types of taxes as well as royalties on the energy they produce. Western states also have school trust funds funded by productive activities like oil and natural gas development on state lands.

**Targeted Oil and Gas Restrictions from GrSG Plans.** The oil and gas specific restrictions in the GrSG plans result in increased costs due to limitations on activities, and reduce new oil and gas development. The primary restrictions of concern to the Alliance are:

- Overly expansive and burdensome lek buffers (e.g., 3.1 miles) and noise buffers;
- Inconsistent and overly burdensome density and disturbance caps;
- Failure to define, recognize and respect Valid Existing Rights;
- Inconsistent and overly burdensome No Surface Occupancy (NSO), Controlled Surface Use (CSU), and Timing Limitations (TL) lease stipulations;
- BLM’s unlawful ceding of authority to U.S. Fish and Wildlife Service for approval of exception, waiver or modification of NSO, CSU, and TL stipulations;
- Imposition of unlawful and overly broad compensatory mitigation and net conservation gain requirements;
- Undue leasing prohibitions and restrictions;
- Arbitrary and unduly burdensome “Required Design Features;”
- Unsupported and overly broad designations of priority habitat management areas; and,
- Arbitrary exemptions for renewable transmission projects (e.g., surface disturbance cap exemption counted against oil and gas development cap).

These provisions are contrary to the President’s Executive Order, titled “Promoting Energy Independence and Economic Growth,” and Secretary Zinke’s Order 3349, “American Energy Independence.” The above provisions should be removed and the land use plans revised so that a proper balance is struck between recognizing and utilizing state conservation plans for the species and continued economic development and growth to ensure American energy independence and dominance.

**Revision of the Land Use Plans is a Necessity.** Given the expansive and unduly burdensome restrictions in these plans, it is critical that Interior revise the land use plans rather than simply seeking to make limited changes. Moreover, the States should have

---

<sup>1</sup> These numbers are based upon analysis of Scenario Two in the attached economic analysis, which tracks with the restrictions contained in the final federal land use plans issued in 2015.

primary management authority over the conservation of the GrSG because it is not a listed species, and the States have more local expertise.

State efforts, such as in Montana, Utah, and Wyoming, provide a more sensible and adaptive approach to GrSG management while balancing future economic growth that is entirely lacking in the current plans which utilize a federal, command and control, one-size-fits-all approach.

**Additional Considerations.** The Alliance also provides the following additional considerations for review of the GrSG federal land use plans:

**1. Rescission of 2016 Instruction Memoranda**

The instruction memoranda issued in 2016 should each be rescinded in their entirety, as these guidelines further exacerbate the unduly burdensome restrictions of the GrSG plans.

**2. Issuance of Instruction Memoranda on Valid Existing Rights**

While the GrSG Records of Decision and land use plans liberally utilize the phrase “valid existing rights” – it is not defined anywhere in the plans, and is imposed and implemented in a manner that disregards these rights. “Valid Existing Rights” should be explicitly defined as any lease, permit or authorization issued or granted prior to the date of issuance of the GrSG Records of Decision.

**3. Review of Alliance’s Data Quality Act challenges**

In 2015, the Alliance submitted a series of Data Quality Act challenges to Interior on: (1) BLM’s National Technical Team Report; (2) the USFWS’s Conservation Objectives Team Report; (3) the USGS GrSG Monograph; and, (4) the USGS “Conservation Buffer Distance Estimates for Greater Sage-Grouse—A Review”<sup>1</sup> (the Buffer Report). These reports contain significant data quality flaws, omissions, and fundamental scientific errors, yet were still utilized as foundational elements for formulation of the GrSG plans.

The Interior GrSG Review Team should review the Alliance’s Data Quality Act submissions to identify key scientific and data flaws that need to be addressed and corrected in the revised GrSG plans.

**4. Revisions to Habitat Mapping and Habitat Designations**

The habitat designations reflected in the current land use plans are based on computer mapping exercises built around overly burdensome and far reaching leks and buffers that are not supported by science, resulting in inaccurate and overbroad habitat designations.

The plans should be revised to provide States with primacy in designating habitat and expressly allow for adaptation of designation habitat based upon local conditions and data from State recommendations. The revised plans and RODs should also include an express provision that affords site-specific ground-truthing of habitat areas on a project-specific basis.

#### 5. Guiding Principles for Management Provisions

As Interior and BLM move forward to revise the GrSG plans and RODs, the following guiding principles should be in the forefront:

- Viable management strategies in the RMPAs and RODs must be: (1) based on science; (2) designed to promote certainty, affordability, flexibility, simplicity, and accessibility; and, (3) operationally and legally viable.
- RMPAs must provide a platform that allows for transparency and regulatory certainty at the project level.
- Conserve high-quality habitat where it makes the greatest ecological difference, while balancing economic activity and recognizing valid existing rights.
- Provide adaptability to improve the effectiveness and efficiency of BLM management.

Thank you for your time and consideration. The Alliance looks forward to continued dialog regarding these important issues on a going forward basis.

Please do not hesitate to contact us if you have any questions or would like additional information.

Sincerely,



Kathleen M. Sgamma  
President

**From:** Rachel Sanborn  
**To:** [jimothy\\_williams@ios.doi.gov](mailto:jimothy_williams@ios.doi.gov)  
**Cc:** [Bruce.Hinchey](mailto:Bruce.Hinchey); [kathleen\\_benedetto@ios.doi.gov](mailto:kathleen_benedetto@ios.doi.gov); [jruhs@blm.gov](mailto:jruhs@blm.gov); [mruugwell@blm.gov](mailto:mruugwell@blm.gov); [lclaypoo@blm.gov](mailto:lclaypoo@blm.gov); [Spencer.Duane](mailto:Spencer.Duane) ([dspencer@blm.gov](mailto:dspencer@blm.gov)); [bwgreen@blm.gov](mailto:bwgreen@blm.gov)  
**Subject:** PAW support of Wyoming Sage-Grouse executive order  
**Date:** Monday, July 17, 2017 5:30:57 PM  
**Attachments:** [7-17-17 Zinke Letter.pdf](#)

---

Please find attached letter from PAW regarding – PAW support of Wyoming Sage-Grouse Executive Order - Revisions needed to Sage-grouse Management Plans to Advance Oil and Gas Development in Wyoming. If you have further questions please feel free to contact PAW.

Best regards,

Rachel Sanborn

Office Manager

Petroleum Association of Wyoming

951 Werner Ct., Ste 100

Casper, WY 82601-1351

Office Hours: Mon-Friday 8 am – 4 pm MST

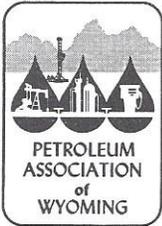
Office: (307) 234-5333

Fax: (307) 266-2189

Web: [www.pawyo.org](http://www.pawyo.org) <[https://urldefense.proofpoint.com/v2/url?u=http-3A\\_\\_www.pawyo.org\\_&d=CwMFAg&c=OYgffNzgehjPA-EI6wokxg&r=gdDyx4WXbF95Ky0tkfyIzgXt0rv24nOLBdeMvbm8&m=c0fo0DTotrSGOg2pO2hvFXiamhASPWJJKDxe4Wr1QA&s=xDxt27i49V0xKtZuKD0DAzrOdG74zVA74sveEaZ6VT4&e=>](https://urldefense.proofpoint.com/v2/url?u=http-3A__www.pawyo.org_&d=CwMFAg&c=OYgffNzgehjPA-EI6wokxg&r=gdDyx4WXbF95Ky0tkfyIzgXt0rv24nOLBdeMvbm8&m=c0fo0DTotrSGOg2pO2hvFXiamhASPWJJKDxe4Wr1QA&s=xDxt27i49V0xKtZuKD0DAzrOdG74zVA74sveEaZ6VT4&e=>)>

General Email Box: [paw@pawyo.org](mailto:paw@pawyo.org) <<mailto:paw@pawyo.org>>

This communication is the property of the Petroleum Association of Wyoming and may contain confidential and privileged information. Unauthorized use of this communication and its contents is strictly prohibited and may be unlawful. You should not disseminate, distribute or copy this e-mail without express authorization from the Petroleum Association of Wyoming. If you are not the intended recipient you are notified that disclosing, copying, distributing or taking any action in the reliance on the contents of this information is strictly prohibited.



# PETROLEUM ASSOCIATION OF WYOMING

951 Werner Court, Suite 100  
Casper, Wyoming 82601  
(307) 234-5333

fax (307) 266-2189  
e-mail: paw@pawyo.org  
www.pawyo.org

July 17, 2017

Secretary Ryan Zinke  
U.S. Department of the Interior  
1849 C Street, N.W.  
Washington, DC 20240

RE: PAW Support of Wyoming Sage-Grouse Executive Order  
Revisions Needed to Sage-grouse Management Plans to Advance Oil and Gas  
Development in Wyoming

Dear Secretary Zinke:

PAW is Wyoming's largest and oldest oil and gas organization dedicated to the betterment of the state's oil and gas industry and public welfare. PAW members, ranging from independent operators to integrated companies, account for approximately ninety percent of the natural gas and eighty percent of the crude oil produced in Wyoming.

PAW supports Wyoming Sage-Grouse Executive Order 2015-4 (EO) which protects 23% of Wyoming (15 million acres) as Priority Habitat Management Area (PHMA) and supports 85% of all sage-grouse in the state. Provisions of the EO include disturbance limitations in PHMAs of 1 disturbance per 640 acres (1/640) and a total 5% disturbance threshold in PHMA. Also, compensatory mitigation is required if EO PHMA thresholds are exceeded. PAW strongly supports consistent application of compensatory mitigation as outlined in the EO Compensatory Mitigation Framework on fee, state *and federal* lands.

Oil and gas development is being impeded in the state partly as a result of inconsistencies between the BLM Sage-grouse RMP amendments, specifically the 9-Plan and the Buffalo and Bighorn Basin RMP revisions released in 2015 (RMP Amendments and Revisions). Due to these inconsistencies, projects and APDs are being deferred or delayed by BLM. Following are the actions that will need to occur in order to achieve consistency with the EO and help advance energy development in Wyoming:

- **Revise identified PHMA boundaries** – In 2015, Wyoming revised its PHMA boundaries. Federal agencies, including BLM, USFS and USFWS, State Agencies, the Governor's Office, industry, and NGOs all participated in this public process. While the revision resulted in a net increase to lands identified as PHMA, lands were also taken out of PHMA and identified as General Habitat Management Areas (GHMAs). The RMP Amendments and Revisions include the previously mapped PHMA boundaries (Version

3). In order to resolve these issues, BLM needs to adopt Wyoming's revised PHMA boundaries (Version 4).

- **Eliminate compensatory mitigation requirements on federal lands in GHMAs** – The RMP Amendments and Revisions include provisions interpreted by some BLM staff to require compensatory mitigation in GHMA in order to meet a “no net loss” mitigation requirement. This is not a requirement under the EO. The RMP Amendments and Revisions must be changed to eliminate this requirement.
- **Eliminate compensatory mitigation requirements on federal lands in PHMA when thresholds are not exceeded** – The RMP Amendments and Revisions require in PHMA a “net conservation gain” standard and compensatory mitigation for any development that takes place. The EO requires compensatory mitigation only when PHMA thresholds are exceeded. The RMP Amendments and Revisions need to be changed to eliminate compensatory mitigation requirements in PHMAs when thresholds are not exceeded.
- **Grant timing stipulation relief in GHMA lek buffers on federal lands consistent with the EO Compensatory Mitigation Framework** – The EO Compensatory Mitigation Framework allows for consistent and programmatic timing stipulation relief in GHMA lek buffers to incentivize development outside of PHMA. There is a compensatory mitigation cost for this timing stipulation relief. BLM has advised they are unable to grant timing stipulation relief in GHMA lek buffers without going through a burdensome exception, modification and waiver process following APD approval. The RMP Amendments and Revisions need to be revised to allow BLM to grant timing stipulation relief in GHMA lek buffers at the point of APD approval in a programmatic fashion consistent with the EO Compensatory Mitigation Framework.
- **Eliminate project-by-project compensatory mitigation calculation determinations and instead utilize the EO Compensatory Mitigation Framework** – BLM has deferred projects in order to determine compensatory mitigation amounts rather than utilizing the established mitigation ratios in the EO Compensatory Mitigation Framework. BLM has indicated they need to do this as part of the NEPA requirements under the RMP Amendments and Revisions. Changes need to be made to allow BLM to rely on the landscape level NEPA completed as part of the RMP Amendments and Revisions, eliminating the need to justify through project level NEPA analysis the use of the EO Compensatory Mitigation Framework to calculate mitigation amounts.
- **Ensure 2017 draft EISs are consistent with EO approach to mitigation** – After a seven year process, the NPL DEIS was released in July, 2017. The compensatory mitigation requirements contained in the DEIS are not consistent with the EO approach to mitigation. We have further concern that the compensatory mitigation requirements in the upcoming Converse County and Crossbow draft EISs scheduled to be released later this year will also be inconsistent with the EO approach to mitigation as well federal

mitigation policy. The mitigation requirements in these EISs need to be made consistent with the EO and revised federal mitigation policy when they are released in final form.

Please feel free to contact me if you have any questions or would like to further discuss our position with relation to sage-grouse management in Wyoming.

Sincerely,

  
Bruce Hinchey  
President

cc: Kathleen Benedetto, Department of the Interior  
John Ruhs, BLM Acting Deputy Director  
Mary Jo Rugwell, BLM Wyoming State Director  
Larry Claypool, BLM Wyoming Associate State Director  
Duane Spencer, BLM Deputy State Director, Minerals and Lands  
Buddy Green, BLM Deputy State Director, Resource Policy and Management  
Matthew H. Mead, Wyoming Governor