



## **Karen Budd-Falen Has Too Many Conflicts Of Interest To Do Her Job.**

### **Karen Budd-Falen Owned Stock In A Variety Of Companies That The Department Of The Interior Regulates.**

#### **Karen Budd-Falen Owned Stock In The Oil And Energy Companies That The Department Of The Interior Is Supposed To Regulate.**

**Karen Budd-Falen Owned Stock In Anadarko Petroleum Corporation.** She owned between \$1,001 and \$15,000 in this stock. [[Karen Budd-Falen 278](#), 11/27/18]

- **Anadarko Was A Major Public Lands Oil And Gas Driller.** At one point, it “exceeded the federal limit on the number of leased acres” it could “control in any one state.” [*Associated Press*, [06/01/04](#)]

**Karen Budd-Falen Owned Stock In EOG Resources Inc.** She owned between \$1,001 and \$15,000 in this stock. [[Karen Budd-Falen 278](#), 11/27/18]

- **EOG Resources Is A Public Lands Oil And Gas Driller That Sought To Drill Exploratory Wells In Bears Ears National Monument.** “Energy developers are seeking to drill three exploratory wells inside the proposed Bears Ears National Monument in search of hydrocarbon riches on both state and federal lands a few miles northeast of Bluff. Conservationists and local leaders fear drilling could imperil the town's water and scenic vistas and industrialize an area some say should be preserved for its geological and archaeological treasures. [...] But EOG Resources, a Houston-based company active in the Uinta Basin's oil patch, is willing to gamble on wildcat wells on the Bluff Bench. In May, the Utah Division of Oil, Gas and Mining approved EOG's proposal to drill on state trust lands.” [*Salt Lake Tribune*, [11/11/16](#)]

**Karen Budd-Falen Owned Stock In Whiting Petroleum Corporation.** She owned less than \$1,001 in this stock. [[Karen Budd-Falen 278](#), 11/27/18]

- **Whiting Petroleum Is A Public Lands Oil Driller That Benefited From The Trump Administration's "Lighter Touch" When DOI Declined To Penalize It For Spilling 107 Barrels Of Oil In 2017.** “Trump's Interior Department is also taking a lighter touch on enforcing laws it has on the books. A BLM official decided against proceedings to penalize Whiting Petroleum Corp. for spilling 107 barrels of oil in Colorado on March 28, 2017. ‘Seems to me that failing to report a major undesirable event ought to be more than a wrist slap,’ Gregory



Shoop, then the associate state director for the BLM's Colorado office, said in an email to Mark Lyon, a supervisory petroleum engineering technician for the BLM in Colorado. 'But that's a problem for another day.' The documents were obtained through WildEarth Guardians' FOIA request." [*Grist*, [07/21/18](#)]

**Karen Budd-Falen Owned Stock In The Alerian MLP Index Fund.** [[Karen Budd-Falen 278](#), 11/27/18]

- **The Alerian MLP Index Fund's Holdings Are 100 Percent Oil and Gas or "Oil and Gas Related."** This fund is 9.61 percent oil and gas and 90.39 percent "oil and gas related equipment and services." Some of its holdings include Phillips 66 Partners, NuStar Energy, and Western Midstream Partners. [[Karen Budd-Falen 278](#), 11/27/18] and [ETF.com, [accessed 09/26/19](#)]

**Karen Budd-Falen Owns Stock In Xcel Energy.** [[Karen Budd-Falen 278](#), 11/27/18]

- **Xcel Energy Has Substantial Business Before The Department Of The Interior.** "The Bureau of Land Management San Luis Valley Field Office, in cooperation with the Pike San Isabel National Forest, is seeking public comments on a draft environmental assessment authorizing Xcel Energy to rebuild three existing transmission lines." [Bureau of Land Management, [02/09/15](#)]
- **A Search Of BLM's LR2000 Database For Xcel Energy Shows 36 Authorized, Closed, And Pending Cases In Colorado And New Mexico.** [LR2000 Search Results For "Xcel Energy," [accessed 09/26/19](#)]

**Karen Budd-Falen Divested Some Of Her Energy Stocks Six Months After Joining Interior.**

**Karen Budd-Falen Divested Some of Her Stocks In April 2019.** A United States Office of Government Ethics Certificate of Divestiture says Karen Budd-Falen sold off her stocks in Alerian MLP ETF, Altria Group, Anadarko, EOG, and Whiting Petroleum. [[OGE Certificate of Divestiture](#), 04/04/19]

**The Divestiture Certificate Is Dated Nearly Six Months After Karen Budd-Falen Joined Interior.** Karen Budd-Falen Was Appointed Deputy Solicitor Of Fish, Wildlife, And Parks In October 2018. [*E&E*, [10/15/18](#)]

**Karen Budd-Falen Does Not Appear To Have Divested Her Stock In Xcel Energy.** [[OGE Certificate of Divestiture](#), 04/04/19]



**Karen Budd-Falen Owns A Network Of Rental Properties In Laramie And Cheyenne, Wyoming.**

**Karen Budd-Falen And Her Husband Own A Small Empire Of Residential And Commercial Rental Properties.** Karen Budd-Falen reports that she and her husband own L-F Enterprises LLC, which received between \$100,001 and \$1,000,000 in the year preceding her appointment to DOI. L-F Enterprises includes at least eight commercial and residential properties in Cheyenne and Laramie, Wyoming. [[Karen Budd-Falen 278, 11/27/18](#)]

**Karen Budd-Falen Has An Ownership Stake In A Ranching Empire Spanning Hundreds Of Thousands Of Acres Of Public Land -- Including Prime Sage Grouse Habitat.**

**Karen Budd-Falen Has An Ownership Stake In A Massive Public Lands Ranch In Nevada With "Incomplete" Rangeland Health Assessments.**

**Karen Budd-Falen Says She Has Ranches With USFS Permits, BLM Permits, And Private Land.** Budd-Falen said, "we have Forest [Service] permits and BLM permits and state land permits and we got private land, because we're ranchers." ["[Karen Budd-Falen – Local Land use Plans & Petitions for Redress of Grievances](#)," Washington County on YouTube, [10/25/16](#) (01:37)]

**Karen Budd-Falen Reports An Ownership Stake In The Home Ranch In Orovada, Nevada.** Karen Budd-Falen reported jointly owning Home Ranch LLC, a cattle ranch in Orovada, NV, with her husband. Its value is between \$5,000,001 and \$25,000,000. [[Karen Budd-Falen 278, 11/27/18](#)]

**Home Ranch LLC Is A Nevada Business.** Home Ranch LLC's registered agent is Loyd Sherburn. Its managers are Frank Falen, Loyd Sherburn, and George Kershner. [Nevada Secretary of State search, [accessed 09/25/19](#)]

**Home Ranch LLC Is Authorized To Graze Nearly 30,000 Cattle Across Over 259,000 Acres Of Public Land.** Home Ranch LLC has Three BLM Grazing Allotment Authorization Numbers. They include 2703880, 2702165, and 2702215, which correspond to the Daveytown, U C, and Jordan Meadows grazing allotments. The combined public land acreage of these allotments is 259,048 with 29,771 authorized AUMs and 8,939 suspended AUMs. [BLM RAS Search, [accessed 09/25/19](#)]

WBOLDT ER FIELD ICE	NV00019	DAVEYTOWN	Y	107,305	AMP IMPLEMENTED	07/09/1982	CUSTODIAL CATEGORY	2703880	C	5,149	0	0
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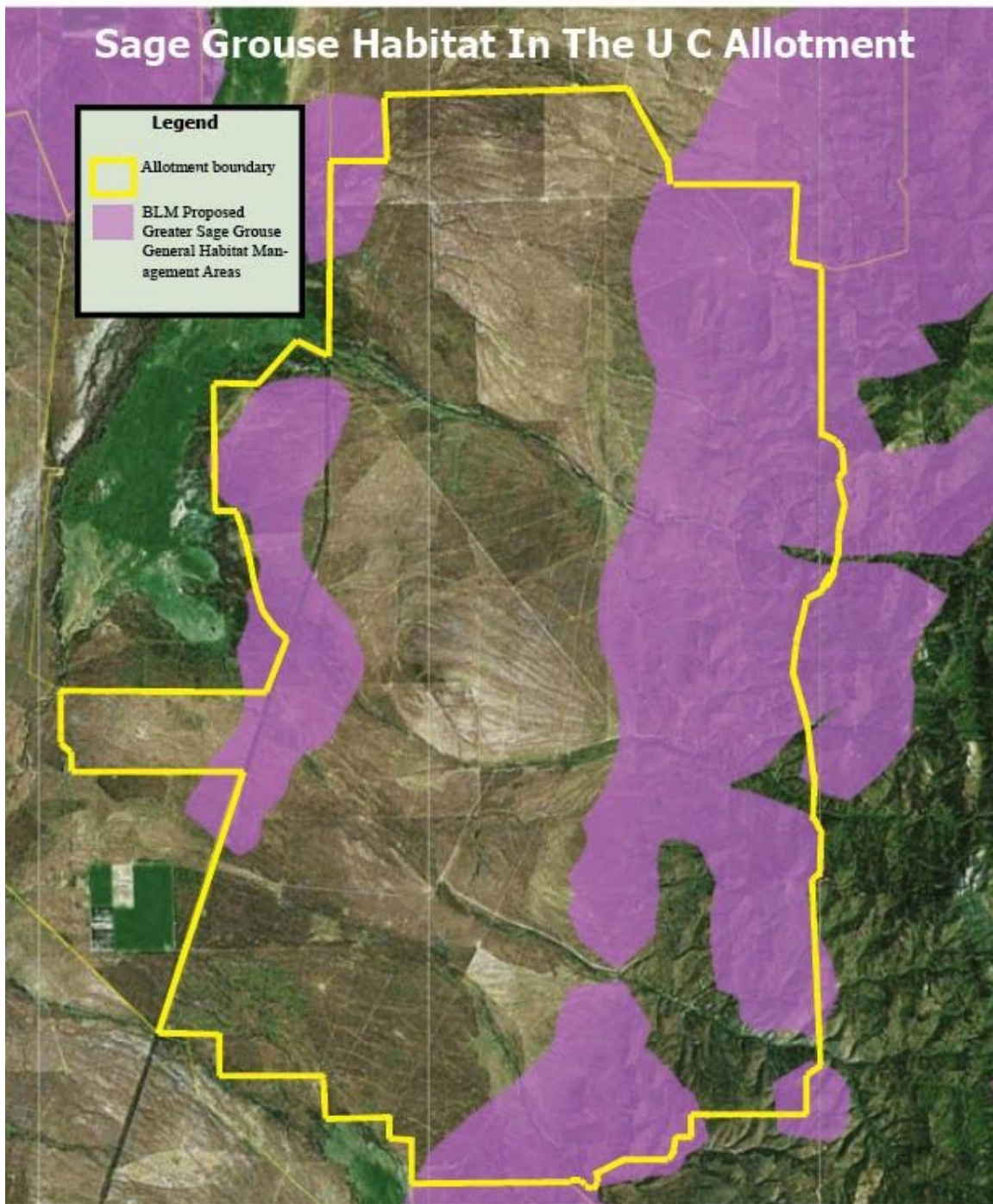


W BOLDT R FIELD ICE	NV00005	U C	Y	45,248	AMP IMPLEMENTED	03/01/1971	MAINTAIN CATEGORY	2702165	C	12,902	0	0
W BOLDT R FIELD ICE	NV00004	JORDAN MEADOWS	Y	106,495	AMP IMPLEMENTED	06/19/1995	MAINTAIN CATEGORY	2702215	C	11,720	8,939	

*BLM RAS search results*

**Karen Budd-Falen’s BLM Grazing Allotments Include Prime Sage Grouse Habitat.**

**Karen Budd-Falen’s U C Allotment Includes A Substantial Acreage Of BLM Proposed Greater Sage Grouse General Habitat Management Areas. [PEER Rangeland Health Standards Evaluation Data, [accessed 09/25/19](#)]**



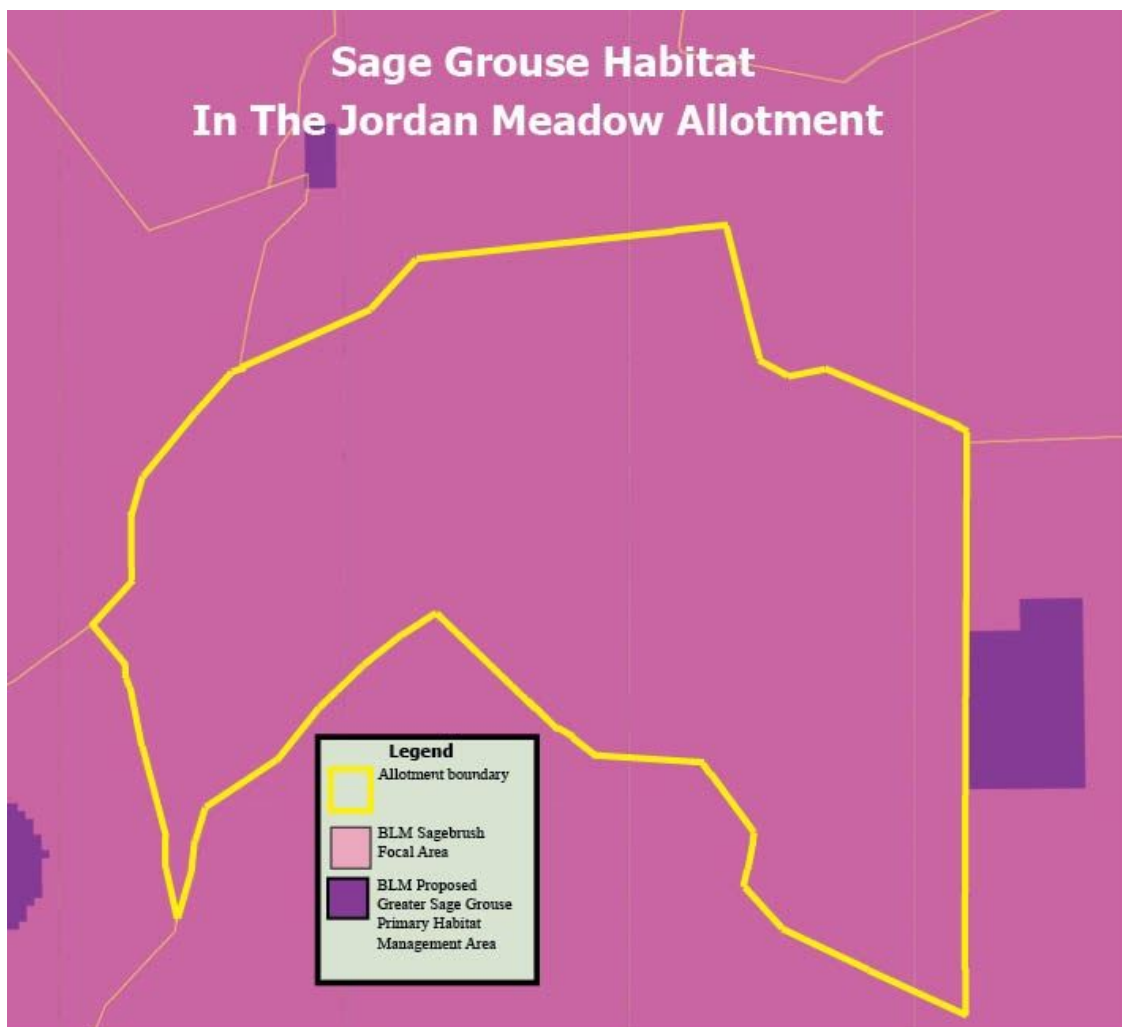
Source: PEER. Boundary emphasis added. For scale, the allotment area encompasses 45,248 acres.

**General Habitat Management Areas Are Lands Where Special Management Would Apply To Sustain Sage Grouse Population.** "Priority Habitat Management Areas



(PHMAs): Lands identified as having the highest habitat value for maintaining sustainable sage-grouse populations. [... General Habitat Management Areas (GHMAs): Lands that are seasonal or year-round habitat outside of PHMA where some special management would apply to sustain sage-grouse populations.” [Congressional Research Service, [08/15/16](#)]

**Karen Budd-Falen’s Jordan Meadow Allotment Is Entirely Within A BLM Sagebrush Focal Area.** It is adjacent to a BLM proposed greater sage grouse primary habitat management area. [PEER Rangeland Health Standards Evaluation Data, [accessed 09/25/19](#)]



*Source: PEER. Boundary emphasis added. For scale, the allotment area encompasses 106,495 acres.*

**Sagebrush Focal Areas Have “The Highest Densities Of Sage-Grouse And Other**



**Criteria Important For The Persistence Of The Species.** “Priority Habitat Management Areas (PHMAs): Lands identified as having the highest habitat value for maintaining sustainable sage-grouse populations. Sagebrush Focal Areas (SFAs): Subsets of PHMAs, these lands were identified as having the highest densities of sage-grouse and other criteria important for the persistence of the species. These areas include the highest protections from new surface disturbances, such as mining activities, to protect sensitive habitats.” [Congressional Research Service, [08/15/16](#)]

**Karen Budd-Falen Worked On The Interior Policies She Would Enact If She “Were King” On Trump’s Interior Transition Team. Later, Interior Removed Sage Grouse Protections From Her Private Land And Grazing Leases.**

**Karen Budd-Falen Was On Donald Trump’s Interior Transition Team.** “Budd-Falen worked on the Trump administration's Interior transition team in early 2017. For over a year, her name circulated as a front-running contender for the job of Bureau of Land Management director. The BLM post requires Senate confirmation, unlike the deputy solicitor's job, and Democrats could have held up her potential nomination as they have stymied other Interior nominees. Interior sources said the agency and the White House decided against nominating Budd-Falen for BLM because she has had numerous legal clashes with the agency over the years and was unlikely to be confirmed.” [E&E, [10/15/18](#)]

**Karen Budd-Falen Said She Worked On Policies That She Would Enact If She “Were King” On The Interior Transition Team.** “I had the great pleasure of serving on the Trump transition team when he was elected president. So I worked from my office for a couple of months and then I went back to Washington, DC and I got to work on the interior transition team and work on policies that we believe the Department of Interior should enact during the first two years at Interior. And it was really fun because they go into this huge room with all these computers and people who are on transition from defense and agriculture and EPA-- we're all sitting in this giant room together and they really did say, if you were king, what would you do? And I’m thinking, ‘oh, I like being king. We’ve got all sorts of ideas about what we’d do.’ And so we looked at all these policies.” [Montana Voter on YouTube, [09/20/17](#)] (01:35)

- **Karen Budd-Falen Said That Obama-Era Sage Grouse Plans “Are Bad. They’re Totally Bad.”** In remarks to Washington County on how to file for petitions of redress of grievances, Karen Budd-Falen said, “I think if you do a petition, for example, I would look at at some of the planning they're doing for the sage-grouse-- you guys all looked at those sage grouse RMPs-- have you seen the monitoring requirements and those things? Those agencies aren't going to be able to comply with those monitoring requirements. You guys are going to get monitored to death. They're bad. They're totally bad. So why not petition,



whether it's for this administration or the next administration, or whatever to get those monitoring requirements changed. [Washington County on YouTube, [10/25/16](#)] (38:41)

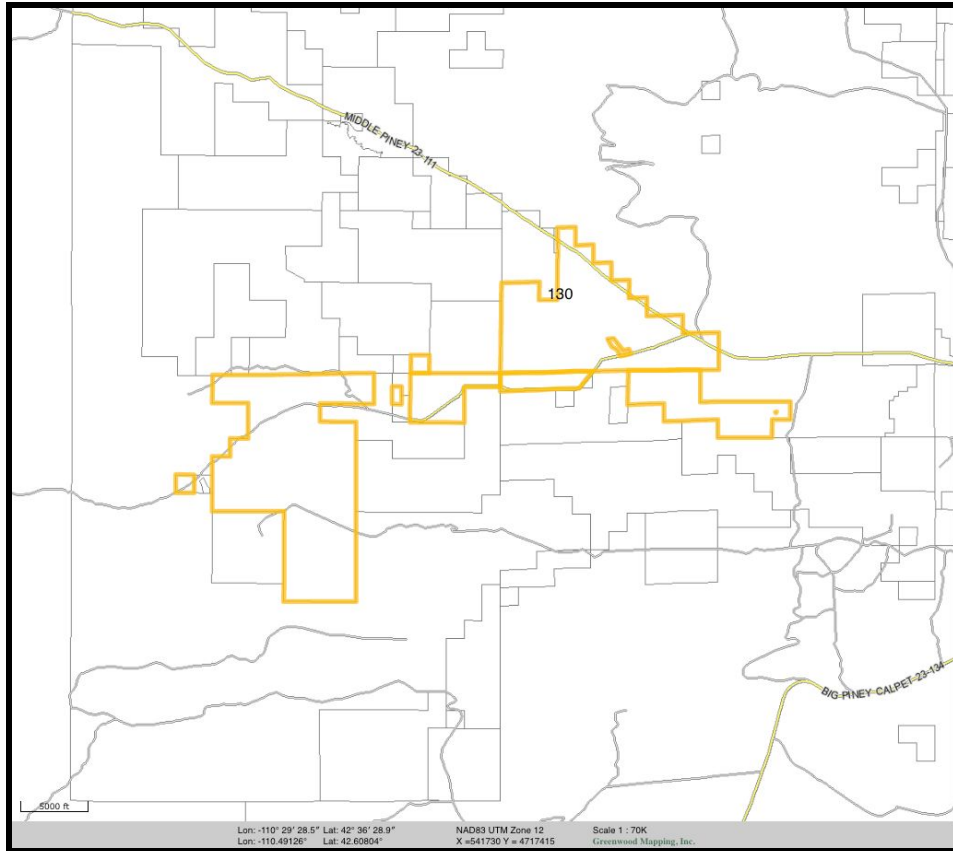
**The Trump Administration Reversed Obama-Era Regulations That Protected Sagebrush Focal Areas Like The Ones In Karen Budd-Falen’s Grazing Allotments.**

“The Trump administration on Thursday detailed its plan to open nine million acres to drilling and mining by stripping away protections for the sage grouse, an imperiled ground-nesting bird that oil companies have long considered an obstacle to some of the richest deposits in the American West. In one stroke, the action would open more land to drilling than any other step the administration has taken, environmental policy experts said. It drew immediate criticism from environmentalists while energy-industry representatives praised the move, saying that the earlier policy represented an overreach of federal authority. [...] Under a plan put forth in 2015, during the Obama administration, oil and gas drilling was banned or limited in 10.7 million acres where the bird lives, under a stringent designation known as “sagebrush focal areas.” Known for its distinctive mating dance, the land-dwelling grouse has seen its numbers sharply decline in recent decades. [...] The new Trump proposal, which is expected to be finalized next year, would limit that highly protected area to 1.8 million acres and eliminate the requirement that companies pay into the habitat preservation fund, although companies could pay into it voluntarily.” [New York Times, [12/06/18](#)]

**Karen Budd-Falen Also Owns Thousands Of Acres Of Sage Grouse Habitat In Wyoming.**

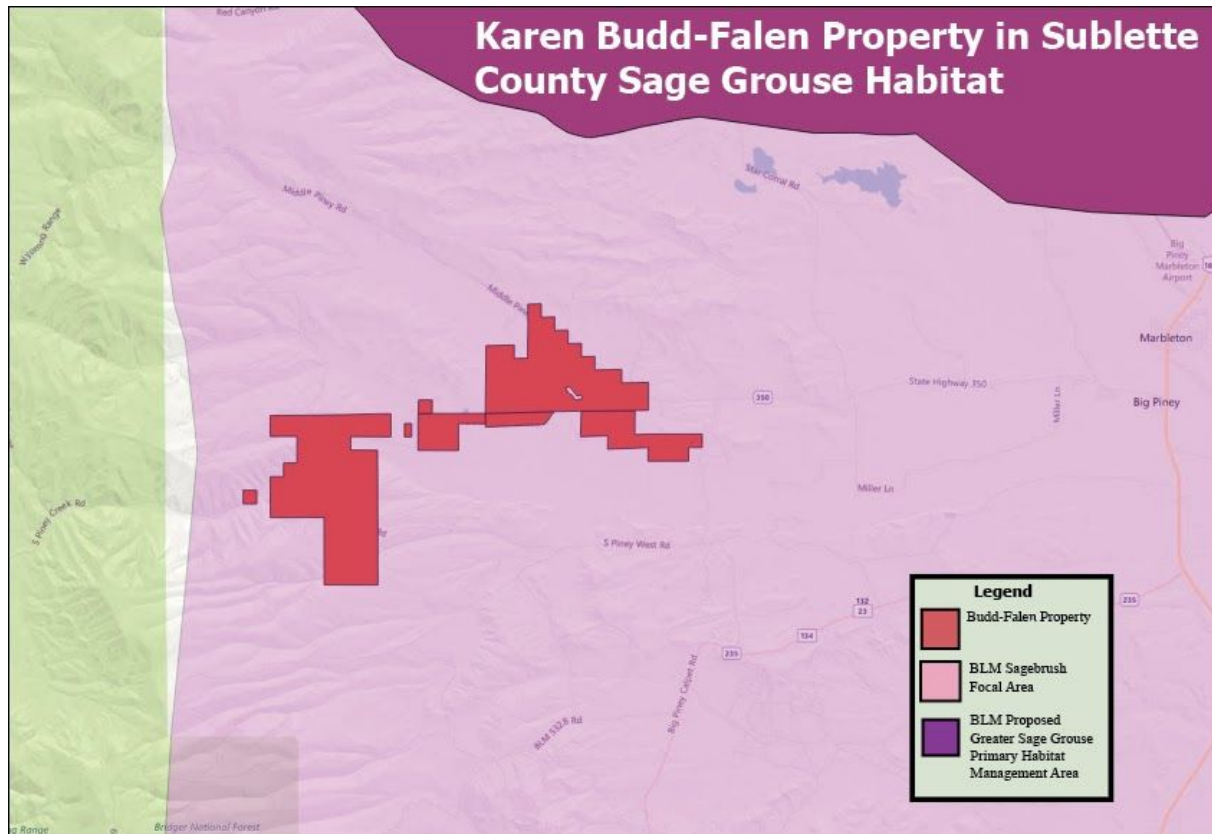
**Karen Budd-Falen co-owns six parcels totalling 6,518 acres in Sublette County Just East Of Bridger Teton National Forest.**





*Budd-Falen parcels in Sublette County. Source: [Sublette County](#)*

**Karen Budd-Falen's Private Property In Sublette County Is Entirely Within A Sagebrush Focal Area Under The 2015 Sage Grouse Management Plans.**



Property data source: [Sublette County](#)  
Sage Grouse data source: PEER

**Sagebrush Focal Areas Have “The Highest Densities Of Sage-Grouse And Other Criteria Important For The Persistence Of The Species.”** “Priority Habitat Management Areas (PHMAs): Lands identified as having the highest habitat value for maintaining sustainable sage-grouse populations. Sagebrush Focal Areas (SFAs): Subsets of PHMAs, these lands were identified as having the highest densities of sage-grouse and other criteria important for the persistence of the species. These areas include the highest protections from new surface disturbances, such as mining activities, to protect sensitive habitats.” [Congressional Research Service, [08/15/16](#)]

**Karen Budd-Falen’s Ranches Also Include Substantial Private Land In Nevada And Wyoming.**

**Home Ranch LLC Owns 14,739.51 Acres Of Private Land In Humboldt County.** Home Ranch LLC owns 19 parcels of private land in Humboldt County, Nevada with an assessed value of \$530,859. The property includes parcel numbers 3020104



30-261-14, 30-261-17, 30-261-19, 30-321-06, 30-321-09, 30-331-19, 30-331-39, 30-331-42, 30-331-51, 30-331-52, 30-391-03, 30-391-05, 30-391-13, 30-391-14, 30-401-67, 30-401-85, 30-401-86, and 30-401-87. [Humboldt County Property Searches, [accessed 09/25/19](#)]

- **Each Parcel Number Lists The “Owner Address” As PO Box 346 In Cheyenne, Wyoming.** [Humboldt County Property Searches, [accessed 09/25/19](#)]
- **Budd-Falen Law Offices Also Uses PO Box 346 In Cheyenne As Its Address.** [Budd-Falen Law Offices, [accessed 09/25/19](#)]

**Karen Budd-Falen Has An Ownership Stake In A Wyoming Ranch Called KJM LLC.** Karen Budd-Falen reports an owning a 33 percent stake in KJM LLC, a cattle ranch valued between \$1,000,001 and \$5,000,000. [[Karen Budd-Falen 278](#), 11/27/18]

**Karen Budd-Falen is the registered agent for KJM LLC in Wyoming.** KJM LLC is current and in good tax standing, but received a delinquency tax notice in 2014. [Wyoming Secretary of State, [accessed 09/25/19](#)]

**KJM LLC and The Budd-Falens Own Private Land In Sublette County.** Both KJM LLC and Budd-Falen have been acquiring land in Sublette County. [Sublette County Property Searches for “KJM” and “Budd-Falen,” [accessed 09/25/19](#)]

### **Karen Budd-Falen Is An Extremist Who Has Called For The Endangered Species Act To Be Repealed.**

#### **Karen Budd-Falen Opposes FLPMA And Said She “Would Repeal The ESA In A Heartbeat.”**

**In A 2016 Speech, Karen Budd-Falen Said She “Would Repeal The ESA In A Heartbeat.”** Budd-Falen said, “The original intent of the ESA before it became so co-opted was we were going to get American species on the list. We were going to do something affirmative. We were going to write recovery plans. We were going to do something affirmative and then get them off the list. And when you hear that as a Congressman, and when you read the language of the ESA itself-- not the regulations, not all the interpretation, you read that language-- language is not that hard. It talks about how we're going to cooperate with states and how it's going to be this partnership and states are going to have all this control-- the original act says all that stuff. Right now, I would repeal the ESA in a heartbeat. But they tell me Congress will never do that in a bazillion years. Heck, we can't even get them to offer a bill that amend even a little, teeny piece of it. I suppose we will never get rid of it.” [Karen Budd-Falen At The Cavalry Group, [2016](#)]



### **Karen Budd-Falen Opposes The Federal Land Policy And Management Act (FLPMA).**

Karen Budd-Falen said, "My dad, when I was in high school, went to DC several times to oppose FLPMA. Everybody thinks their dad is really cool. My dad really was really cool. And my dad will tell you that his biggest concern with FLPMA was the shift in philosophy from disposal of public lands to retention of federal lands. So daddy goes back to DC, I remember at least three times that he went in high school, and he loses." [Washington County on YouTube, [10/25/16](#)] (00:22:00)

- **Budd-Falen Said FLPMA Was "Silly" Because It Made the Retention Of Public Lands A Policy.** Budd-Falen says Senator Hansen of Wyoming later apologized to her father for voting for FLPMA because senators were "lead to believe that the shift in mindset from disposal to retention would not be a big deal." Budd-Falen said Hansen's apology "Didn't help, because we still got the silly Act." [Washington County on YouTube, [10/25/16](#)] (00:23:00)

### **Karen Budd-Falen Meets Frequently With Oil Lobbyists And Industry Representatives Who Oppose Sage Grouse Protections.**

#### **Karen Budd-Falen Met With The Oil Industry Lobbyists Who Helped "Rewrite" Obama-Era Sage Grouse Management Plans.**

On June 13, 2019, Karen Budd-Falen had a meeting with Representatives from the Independent Petroleum Association Of America (IPAA). In a calendar event titled simply, "Meeting," Karen Budd-Falen met with people with the email addresses [mmiller@ipaa.org](mailto:mmiller@ipaa.org) and [dnaatz@ipaa.org](mailto:dnaatz@ipaa.org). [Karen Budd-Falen Calendar, [06/13/19](#)]

- **Mark Miller Is A Past Chairman Of IPAA And President Of Merlin Oil & Gas.** [IPAA.org, [accessed 09/26/19](#)]
- **Dan Naatz Is A Lobbyist For IPAA.** [Senate Lobbying Disclosure Database, [accessed 09/26/19](#)]
- **IPAA's Lobbyists Were "Integrally Involved In Rewriting Sage-Grouse Conservation Plans."** "During the Trump administration, IPAA has been integrally involved in rewriting sage-grouse conservation plans. Documents obtained by the Western Values Project indicate that IPAA lobbyists secured numerous meetings with key Interior Department officials, providing an entré for specific companies to give input into sage-grouse plans. In one instance, IPAA arranged phone calls for Chesapeake Energy, ConocoPhillips, and EOG Resources to ask BLM for specific revisions to sage-grouse maps. During the process of amending the sage-grouse conservation plans, IPAA submitted formal comments recommending specific policy changes. It appears that certain IPAA



recommendations – such as cutting requirements to offset habitat damage from development with conservation gains elsewhere – were accepted by the BLM, either partially or in full, as a part of the agency’s draft plans.” [Center For Western Priorities, [03/14/19](#)]

**On June 13, 2019, Karen Budd-Falen had a meeting with Staff From the Western Energy Alliance (WEA).** In a calendar event titled simply, “Meeting,” Karen Budd-Falen met with a person with the email address [tparks@westernenergyalliance.org](mailto:tparks@westernenergyalliance.org). [Karen Budd-Falen Calendar, [06/13/19](#)]

- **Tripp Parks Is The Vice President Of Government Affairs For WEA.** [WEA.org, [accessed 09/26/19](#)]
- **Documents Obtained Through FOIA Show That Interior’s Sage Grouse Review Team Adopted 13 Of WEA’s Sage Grouse Wishlist Recommendations.** “The FOIA requested public correspondence between Interior officials, the sage-grouse review team and oil and gas lobbyist groups. Analysis of a memo by Western Energy Alliance, an oil and gas lobbyist association, found that Secretary Zinke’s handpicked review team adopted 13 of the 15 recommendations. A side-by-side comparison, available here, highlights the coordination.” [Western Values Project, [10/23/17](#)]

### **Karen Budd-Falen Met Multiple Time With Lobbyists For A Group That Wants To Rewrite The Endangered Species Act.**

Karen Budd-Falen had a meeting on “ESA regs” With [jbn@vnf.com](mailto:jbn@vnf.com) On August 27, 2019. [Karen Budd-Falen Calendar, [08/27/19](#)]

- **Joseph B. Nelson Is A Lobbyist With Van Ness Feldman.** [Van Ness Feldman, [accessed 09/26/19](#)]
- **Joseph B. Nelson Is Registered To Lobby On Behalf Of The National Endangered Species Act Reform Coalition (NESARC).** [Senate Lobbying Disclosure Database, [accessed 09/26/19](#)]

Karen Budd-Falen Has An Item In Her Calendar On May 30, 2019 Labeled Simply, “Meeting.” Somebody with the email address [jas@vnf.com](mailto:jas@vnf.com) attended. [Karen Budd Falen Calendar, [05/30/19](#)]

- **Jordan A. Smith Is The Senior Director of Governmental Issues With The Lobbying Firm Van Ness Feldman.** His email address is [jas@vnf.com](mailto:jas@vnf.com). [Van Ness Feldman, accessed 09/25/19]





- **Jordan A. Smith Is A Lobbyist For The National Endangered Species Act Reform Coalition** And The Sonoma County Water Agency. [Senate Lobbying Disclosure Database, [accessed 09/26/19](#)]

#### **NESARC Is A Frequent ESA Critic That Advocates For Changing The Act.**

“Originally enacted in 1973, the Endangered Species Act’s framers envisioned a law which would protect species believed to be on the brink of extinction. When the law was enacted, there were 109 species listed for protection. Today, there are nearly 2,000 on the list, with 250 species considered as ‘Candidates’ for listing [...] Unfortunately, the ESA has failed at recovering and delisting species since its inception. Less than one percent of all listed species have been removed from ESA protection since 1973, and many of those are due to extinction or “data error” (i.e. they never should have been listed in the first place).” [NESARC, [accessed 09/26/19](#)]

**Karen Budd-Falen Had A Meeting On June 11, 2019 With People With The Email Addresses [tck@vnf.com](mailto:tck@vnf.com), [amv@vnf.com](mailto:amv@vnf.com), and [alm@vnf.com](mailto:alm@vnf.com).** [Karen Budd-Falen Calendar, [06/11/19](#)]

- **Tyson C. Kade Is An Attorney At Van Ness Feldman With The Email Address [tck@vnf.com](mailto:tck@vnf.com).** [Van Ness Feldman, [accessed 09/26/19](#)]
  - **Tyson C. Kade Is A Lobbyist For The Arctic Slope Regional Corporation And The Pacific Salmon Treaty Coalition.** [Senate Lobbying Disclosure Database, [accessed 09/26/19](#)]
- **Andrew M. Vanderjack Is A Partner At Van Ness Feldman With The Email Address [amv@vnf.com](mailto:amv@vnf.com).** [Van Ness Feldman, [accessed 09/26/19](#)]
  - **Andrew Vanderjack Is A Lobbyist For The Arctic Slope Regional Corporation, Fennmore Craig P.C., The Pacific Salmon Treaty Coalition, and other clients.** [Senate Lobbying Disclosure Database, [accessed 09/26/19](#)]
- **Alan L. Mintz Is A Partner At Van Ness Feldman With The Email Address [alm@vnf.com](mailto:alm@vnf.com).** [Van Ness Feldman, [accessed 09/26/19](#)]
  - **Alan Mintz Is A Lobbyist For The Arctic Slope Regional Corporation, Fennmore Craig P.C., The Pacific Salmon Treaty Coalition, and other clients.** [Senate Lobbying Disclosure Database, [accessed 09/26/19](#)]



## **Karen Budd-Falen Met With A Lobbyist From Occidental Petroleum To Discuss Endangered Species Act Issues.**

On June 12, 2019, Karen Budd-Falen Had A Meeting On “Dunes Sagebrush Lizard” With Doug Wheeler Of Hogan Lovells. The subject was “oil and gas producers in the Permian Basin work with the state of Texas and Region 2 on a Candidate Conservation Agreement with Assurances (CCAA) for the Dunes Sagebrush Lizard. [Karen Budd Falen Calendar, [06/12/19](#)]

- **Doug Wheeler of Hogan Lovells Is A Lobbyist For Occidental Petroleum Corporation.** [Senate Lobbying Disclosure Database, [accessed 09/26/19](#)]
- **Occidental Petroleum Says The ESA “Is Being Used To Control How We Use The Landscape.”** “A panel of experts at the Permian Basin Petroleum Association (PBPA) meeting – prior to the election – directed the industry’s attention at various ways that the Endangered Species Act could slow oil and gas activities across Texas – especially the water-intensive processes of drilling and fracking. ‘There’s a lot of talk about how the Endangered Species Act is being used to control how we use the landscape,’ Myles Culhane, an attorney for Occidental Petroleum Corp, told the crowd. ‘It is going to be used to control how we manage water in the United States,’ Mr. Culhane added, zeroing in on freshwater mussels like the Texas hornshell mussel, describing how surface water withdrawals by the oil industry could be slowed if more mussels are listed as endangered.” [Truthout, [11/24/16](#)]

On February 22, 2019, Karen Budd-Falen Had Two Separate Meetings With Jim Lynch of K&L Gates. [Karen Budd-Falen Calendar, [02/22/19](#)]

- **Jim Lynch Is A Partner With K&L Gate Specializing In ESA Issues.** “Jim Lynch’s practice focuses on regulatory compliance and environmental law with an emphasis on federal and state environmental statutes, including the Endangered Species Act.” [K&L Gates, [accessed 09/26/19](#)]
- **Jim Lynch Is Not A Registered Lobbyist, But The Firm K&L Gates Has A Large “Global Oil And Gas Practice” That “Represents Participants In Every Segment Of The Oil And Gas Industry.”** “K&L Gates’ global oil and gas practice is built on a deep, practical understanding of the international oil and gas business and the interplay between the legal and commercial aspects of exploring for, producing, transporting, storing, marketing, and processing crude oil, natural gas, liquefied natural gas (LNG), natural gas liquids (NGLs) and other petroleum products. The firm represents participants in every segment of the oil and gas industry, including the related manufacturing, service and supply



sectors. K&L Gates' global oil and gas industry clients include international oil companies, foreign sovereigns, national oil companies and state-owned enterprises." [K&L Gates, [accessed 09/26/19](#)]

**On April 2, 2019, Karen Budd Falen met with Nancie Marzulla, A Founding Partner Of Marzulla Law, to discuss an "ELT red cliffs reserve matter."** [Karen Budd-Falen Calendar, [03/29/19](#)]

- **Marzulla Law Represented A Luxury Home Developer Whose Real Estate Development The Red Cliffs Desert Reserve Was Impacted By The Listing Of The Desert Tortoise As An Endangered Species.** "In the 1980s, James Doyle, a successful real estate developer, purchased over 2,440 acres of land in St. George, Utah and invested large amounts of money to plan development that included luxury homes and nine golf courses. In the early 1990s, the U.S. Fish and Wildlife Service listed the Mojave desert tortoise as threatened under the Endangered Species Act, and designated much of Washington County, Utah – including all of Doyle's land – as critical habitat for the tortoise. To permit development in the rest of the County, the Government created a desert tortoise reserve to use as mitigation for the impacts to the tortoise. In exchange for his agreement to include his land in the most highly protected area of tortoise habitat – the Red Cliffs Desert Reserve – the federal government promised to purchase or exchange Doyle's property so that he would incur no financial losses. However, other than 500 acres of land, which the Government agreed to purchase, the Government has failed to provide land or cash for most of Doyle's property as promised." [Marzulla Law, [04/16/18](#)]

**Karen Budd-Falen Has Met With Other Industry Representatives From The Oil And Mining Industries. The Purposes Of Her Meetings Are Often Obscured With Vague Event Names.**

**On May 30, 2019, Karen Budd-Falen Met With Somebody With The Email Address [militoe@api.org](mailto:militoe@api.org).** The name of the event is simply, "Meeting." [Karen Budd-Falen Calendar, [05/30/19](#)]

- **Eric Milito Is A Vice President At The American Petroleum Institute (API).** "Erik Milito is the vice president of Upstream and Industry Operations for the American Petroleum Institute. Mr. Milito's work covers regulatory and legislative matters related to domestic exploration and production, including access to domestic oil and natural gas resources both onshore and offshore." [API, [accessed 09/26/19](#)]



- **Eric Milito Is A Registered Lobbyist For API.** [Senate Lobbying Disclosure Database, [accessed 09/26/19](#)]

**On August 20, 2019, Karen Budd-Falen had Meeting Titled “Sansonetti Meet and Greet” With Thomas Sansonetti Of The Lobbying Firm Holland & Hart.** [Karen Budd-Falen Calendar, [08/20/19](#)]

- **Thomas Sansonetti Is A Partner At The Lobbying Firm Holland & Hart.** [Holland & Hart, [accessed 09/26/19](#)]
  - **Thomas Sansonetti Is Not Currently Registered To Lobby, But Has Lobbied In The Past For Arch Coal, Newmont Mining, Peabody Energy, And Other Extractive Industries.** [Senate Lobbying Disclosure Search, [accessed 09/26/19](#)]

**On February 15, 2019, Karen Budd-Falen had a meeting with L. Michael Bogert of Midas Gold Inc.** [Karen Budd-Falen Calendar, [02/15/19](#)]

- **Michael Bogert Is The General Counsel For Midas Gold.** In announcing his hire, Midas Gold’s CEO Stephen Quinn said, “We welcome Michael Bogert into his new role and look forward to benefiting (SIC) from his expertise in the Federal regulatory system, and his considerable experience at the State and Federal levels.” [Midas Gold Press Release, [08/30/18](#)]

**On June 4, 2019, Karen Budd-Falen Met With Somebody With The Email Address [aeckman@nma.org](mailto:aeckman@nma.org).** The meeting is titled simply, “meeting.” [Karen Budd-Falen Calendar, [06/04/19](#)]

- **Adam Eckman Is Associate General Counsel For The National Mining Association.** [Mine Expo International, [accessed 09/26/19](#)]

**On April 2, 2019, Karen Budd-Falen met with Robert Gordon and Barbara Goldsmith of [bjgco.com](http://bjgco.com).** [Karen Budd-Falen Calendar [04/02/19](#)]

- **Barbara J. Goldsmith & Company Is “Environmental Management Consulting Services” Company That Represents Major Oil And Mining Companies.** “Barbara J Goldsmith & Company works for a wide set of companies in every major industrial sector in the United States and in Europe, including for example: BP, Chevros, Dow Chemical, Dupont, Eni, Exxon Mobil, Occidental Petroleum, Tio Tinto, and others.” [Barbara J. Goldsmith & Company, [accessed 09/26/19](#)]



On April 10, 2019, Karen Budd-Falen had a “HCP discussion” with [bwahlberg@nossaman.com](mailto:bwahlberg@nossaman.com). [Karen Budd-Falen Calendar, [04/10/19](#)]

- **Brooke Wahlberg Is A Partner At Nossaman LLP. She Counsels Real Estate Developers And Mining Companies.** “Brooke Wahlberg focuses her practice on various areas of environmental law, including the Endangered Species Act (ESA), the Migratory Bird Treaty Act (MBTA), the Bald and Golden Eagle Protection Act (BGEPA), the Clean Water Act (CWA) and the National Environmental Policy Act (NEPA). Ms. Wahlberg counsels some of the nation’s largest electric generation and transmission companies, wind energy companies, pipeline companies, real estate developers, governmental entities, species conservation bankers, investment companies, and mining companies on policy-level and project-specific issues arising under ESA, BGEPA, MBTA, CWA, and NEPA. She currently leads the development of eight Habitat Conservation Plans, several BGEPA permits, and several other ESA, BGEPA and CWA compliance efforts.” [Nossaman LLP, [accessed 09/26/19](#)]