

# THOMPSON DIVIDE COALITION

OUR HOME. OUR WATERSHED. OUR LIVELIHOOD.

June 9, 2011

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Charlie Richmond, Forest Supervisor  
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Via email: [csrichmond@fs.fed.us](mailto:csrichmond@fs.fed.us)

Re: Proposed Lake Ridge Exploratory Oil & Gas Unit

Dear Land Managers:

I write today on behalf of the Thompson Divide Coalition and more than 2,000 people in the Roaring Fork, Crystal, North Fork, and Colorado River Valleys who have joined together to protect the Thompson Divide from oil and gas development. We are uniformly opposed to the recent proposal from SG Interests I, LTD to designate a 32,000-acre exploratory unit almost exclusively on federal lands managed by the White River and GMUG National Forests. This unit would effectively cut in half the area that we have prioritized for permanent protection.

The Thompson Divide Coalition is comprised of ranchers who rely on federal grazing permits to raise livestock in the area; farmers who irrigate with water from the Thompson Divide; local business owners who rely upon the draw Thompson Divide has for tourists and recreationalists and hunters and fisherman; local residents who drink the pure water flowing from the Divide and who have chosen to live here because of the clean environment; wildlife professionals and conservationists who understand the import that Thompson Divide has for wildlife and a wide array of biological species. The Thompson Divide Coalition has also received broad support from local communities and county governments. All of these supporters rely on the Thompson Divide's existing values in some very important way and all of them have been working for several years to permanently protect this landscape and to eliminate the threat of oil and gas development.

SG's decision is clearly not necessary or advisable in the public interest. The existing values of this undeveloped landscape are immense. There is an enormous constituency that either relies upon those existing values or has made protection of those values a primary priority. There is little history of production in the area and no current production. In fact, there is a history of companies walking away from development proposals in the area. Most of the leases SG intends to unitize were issued for next to no money at all: just \$2/acre in most cases. And SG has shown no interest in developing those leases until now, as expiration of all nears. The only other operator with leases in the area, Encana, has publicly said to us and to the press that they do not intend to drill their wells because of much more promising prospects elsewhere. Nonetheless, BLM is considering a proposal that would lock up vast amounts of the landscape for drilling based on future exploration plans. This flies in the face of the public interest and the public will.

Furthermore, BLM is charged to "properly conserve natural resources." In this case the agency will not be able to do so by authorizing a unit agreement that may ultimately lead to development of 18 leases covering most of 32,000 acres in this unique and very rugged area. Proper conservation requires protection of critical existing values. Given the nature of existing values—roadless, quiet and undeveloped lands, unfragmented wildlife habitat and grazing allotments, backcountry hunting and recreational experiences, pure watersheds, clean air, etc.—the BLM will not be able to achieve its mandate if the agency chooses to authorize this unit.

Again, we are opposed to this proposal and we ask that the BLM deny it. At the very least, we ask that BLM not take actions now that may eliminate the potential for leases to expire. If a company wants to develop, let them prove that there are resources worth developing before setting in place a plan that will ensure this area remains leased well into the future and paves the way for long-term development.

Finally, if BLM does decide to consider this proposal, we ask that the agency undertake a thorough environmental analysis, disclose to the public potential impacts associated with development, and that the agency provide formal, open, and transparent opportunities for public comment.

Please keep us updated on this process. Your decision is critical to our success as a coalition.

Thanks very much for your attention to this issue.

Sincerely,

Sincerely,



Jock, Jacober, President

Cc: Senator Michael Bennet ✓

Senator Mark Udall ✓

Rep. Scott Tipton ✓

Harris Sherman

Mike King ✓

Helen Hankins ✓

Barbara Sharrow

Steve Bennett ✓

Roger G. Hall



June 17, 2011

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Grand Mesa, Uncompahgre and Gunnison National Forest  
2250 Highway 50  
Delta, CO 81416  
Via email: [csrichmond@fs.fed.us](mailto:csrichmond@fs.fed.us)

Re: Proposed Lake Ridge Exploratory Oil & Gas Unit

Dear Land Managers:

We write today asking BLM to deny the recent proposal from SG Interests I, LTD to designate a 32,000-acre exploratory unit predominantly on public land within Pitkin County. We have cc'd our congressional delegation in hopes that they will echo our disapproval for this project.

The Pitkin County lands proposed for inclusion in this unit are of critical importance to the County and the residents of Pitkin County. Oil and gas development should reasonably entail a fair, open, and public process. We were disappointed to find out about this proposal second-hand from concerned Pitkin County residents rather than from the BLM. As you are surely aware, the area provides a myriad of environmental, economic, and social resources that deserve the highest protection.

We are not categorically opposed to gas development, recognizing that production is driven by consumer demand. To the extent that there is demand, we also support the concept of domestic production in appropriate locations as an alternative to reliance upon imported resources. Furthermore, under circumstances where leases are under several ownerships, we may support unitization as an effective tool resulting in more efficient oil and gas resource development, economies of scale, and fewer overall impacts to surface and other resources, both on and off Forest lands.

However, the current proposal for unitization includes 18 leases, 16 of which are owned by SG Interests. Encana, the one other leaseholder in the area, has publicly stated its intent not to develop their leases. Accordingly, it would appear to be a misallocation of agency resources to consider whether Encana holdings would be included in a unit sought by SG.

At face value, the intent of the proposal is to commit 32,000 acres of public land for oil and gas exploration and production, to accomplish the following goals:

- Gain the ability to drill one producing well as a means of extending lease terms on all 18 of the individual leases, (many of which are due to expire in 2013;) *We believe that this is not necessary nor advisable in the interest of the public, without any indication that there are significant mineral resources to develop on the remaining leases; The history of production within the area, including lack of drilling and a record of several non-producing wells, does not justify the proposed commitment of such large acreage of public land to long-term development.*
- Extend leases on 32,000 acres of public land prior to release of a Draft Environmental Impact Statement for oil and gas on the White River National Forest that is likely to recommend significant changes in leasing designations and lease stipulations; and Extend leases that would effectively split in half the area that the broad-based Thompson Divide Coalition is seeking to have congressionally withdrawn from mineral leasing and development and other extractive uses. The justification for congressional withdrawal is that such uses are inconsistent with current and historical uses and may result in severe habitat fragmentation and widespread surface disturbance, community impacts, and other adverse impacts to natural resources and the human environment. *We believe that the proposed unitization would interfere with, and compromise ongoing planning efforts at the Forest level, and broadly supported conservation efforts that Pitkin County has long supported.*

In addition to those expressed above, we have the following concerns regarding the proposal for unitization:

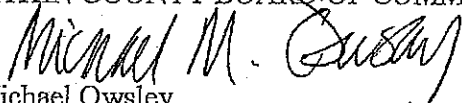
1. Potential impacts to roadless areas are unacceptable due to the myriad of values that may be impacted, including clean water that residents rely upon for domestic and agricultural use, clean air, wildlife habitat, and existing recreational opportunities. People across the country have consistently supported high protection for the remaining roadless lands on our national forests.
2. 13 of the 18 leases proposed for unitization are "gap" leases issued over the top of inventoried roadless areas without adequate stipulations in place to protect roadless area characteristics. These leases should not be unitized or developed without more protective stipulations.
3. The level of controversy surrounding aggressive drilling on these lands is significant: both scientific regarding the scope and level of environmental impacts, and public going to the level of concern and strong support for conservation of the outstanding surface resources.

4. There is no evidence of agency analysis of the potential impacts associated with oil and gas development in this area; Such analysis must be undertaken prior to unitizing 32,000 acres for oil and gas development.
5. The certainty that existing uses and values would be infringed and compromised by extensive mineral development is not in the public interest – Recreational users, livestock operators, a ski area (Sunlight) and hunting and outfitting permittees, as well as private property owners would be impacted. It is important to acknowledge that public lands that support clean air, clean water and healthy wildlife populations are vital to sustaining local rural/recreational tourism economies.

Unitization does not appear to be necessary or advisable in the public interest as required by agency regulations. In addition to compromising ongoing Forest Service planning efforts and publicly supported conservation efforts, there is no apparent public benefit that justifies the potential impacts to roadless areas, water and air quality, wildlife habitat and populations, and local rural and recreational tourism economies, all of which are to a great extent reliant upon public lands in this area. Again, we urge you to deny this proposal. Some places are more valuable undrilled. We think that Thompson Creek is one of those areas.

Thank you for your consideration of this letter. Please keep us updated. Do not hesitate to contact us in the event that you have questions.

Very sincerely yours,  
PITKIN COUNTY BOARD OF COMMISSIONERS

  
Michael Owsley  
Vice-Chair

Cc: Senator Michael Bennet  
Senator Mark Udall  
Rep. Scott Tipton  
Harris Sherman, Undersecretary for Natural Resources and Environment, U.S.  
Department of Agriculture (  
Mike King, Executive Director, State of Colorado Department of Natural Resources  
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Roger G. Hall, Petroleum Engineer, BLM ([rghall@blm.gov](mailto:rghall@blm.gov))



*The Crystal Valley Environmental Protection Association*

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June 20, 2011

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Re: Proposed Lake Ridge Exploratory Oil & Gas Unit

Dear Land Managers:

I write today on behalf of the Crystal Valley Environmental Protection Association, Inc. to ask you to protect the Thompson Divide area from oil and gas development. We are opposed to the recent proposal from SG Interests, LTD to designate a 32,000-acre exploratory unit almost exclusively on federal lands managed by the White River and GMUG National Forests. This unit would effectively cut in half the area that should be prioritized for permanent protection.

Ranchers rely on federal grazing permits to raise livestock in the area; farmers irrigate with water from the mid-elevation watersheds; local business owners rely upon the tourists, recreationalists, hunters and fisherman; local residents drink the pure water. Wildlife professionals understand the importance that Thompson Divide has for wildlife and a wide array of biological species, and residents respect the quality of life and rural lifestyle the communities support.

SG's decision is clearly not necessary nor in the public interest. The existing values of this undeveloped landscape are immense. There is an enormous constituency that either relies upon those existing values or has made protection of those values a primary priority. There is little history of production in the area and no current production. In fact, there is a history of companies walking away from development proposals in the area. Most of the leases SG intends to unitize were issued for next to no money at all: just \$2/acre in most cases. And SG has shown no interest in developing those leases until now, as expiration of all nears. BLM, however, is considering a proposal that would lock up vast amounts of the landscape for drilling based on future exploration plans. This flies in the face of the public interest and the public will.

**Furthermore, BLM is charged to "properly conserve natural resources."** In this case, the agency will not be able to do so by authorizing a unit agreement that may ultimately lead to development of 18 leases covering most of 32,000 acres in this unique and very rugged area. Proper conservation requires protection of critical existing values.

*Board of Directors: John Armstrong, Chuck Downey, John Emerick, Dorothea Farris, Bill Jochems, Michael Mechau, Bill Spence, John Stickney, Peter Westcott, Dale Will*



*The Crystal Valley Environmental Protection Association*

*PO Box 921, Carbondale, CO 81623*

Given the nature of existing values—roadless, quiet and undeveloped lands, unfragmented wildlife habitat and grazing allotments, backcountry hunting and recreational experiences, pure watersheds, clean air, etc.—**the BLM will not be able to achieve its mandate if the agency chooses to authorize this unit.**

Again, we are opposed to this proposal and we ask that the BLM deny it. At the very least, we ask that BLM not take actions now that may eliminate the potential for leases to expire. If a company wants to develop, let them prove that there are resources worth developing before setting in place a plan that will ensure this area remains leased well into the future, thus paving the way for long-term development.

Finally, if BLM does decide to consider this proposal, we ask that the agency undertake a thorough environmental analysis and disclose to the public potential impacts associated with development. The agency shall provide formal, open, and transparent opportunities for public comment.

Please keep us updated on this process. Your decision is critical to the protection of our valley's values.

Thanks very much for your attention to this issue,

*Dorothea Farris*

Dorothea Farris, Chair

Crystal Valley Environmental Protection Association

Cc: Senator Michael Bennet, [Todd\\_Hagenbuch@bennet.senate.gov](mailto:Todd_Hagenbuch@bennet.senate.gov)  
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