

November 10, 2021

Director Tracy Stone-Manning
Bureau of Land Management
760 Horizon Drive
Grand Junction, CO 81506

Re: Request to Update the Dillon Resource Management Because of Outdated/Inadequate Protections Against Oil & Gas Development

Dear Director Stone-Manning:

Congratulations on your recent confirmation as the first Senate-confirmed leader of the Bureau of Land Management in four years. You bring a wealth of knowledge and skills to the agency

We are writing to request that the Bureau of Land Management (BLM) initiate a land-use planning process for the Dillon Field Office in order to address unresolved conflicts between oil and gas activity and the protection of significant natural and cultural resources within the Big Hole, Beaverhead, and Centennial valleys.[1] Doing so would further several of the administration's priorities, including "to ensure that [the federal oil and gas program] serves the public interest and restores balance on America's public lands and waters" and "developing approaches to conserve at least 30% of our lands and waters by the year 2030. . . ."

In recent years, the inadequacy of the 2006 Dillon Resource Management Plan (RMP), which permits oil and gas leasing on nearly 90 percent of public lands in the Dillon Field Office (1.2+ million mineral acres), has become readily apparent, as oil and gas companies have nominated leases in several extremely sensitive areas, including in the Big Hole and Beaverhead watersheds and the Tendoy Mountains where the leaseholder is currently pursuing exploration. Of particular concern, the Dillon RMP: (1) unnecessarily opens and exposes sensitive lands, including habitat for several imperiled fish and wildlife species, to development; (2) encourages speculative leasing; and (3) lacks adequate protections for fish, wildlife, water, recreation, and cultural resources.

1. The Dillon RMP unnecessarily opens and exposes sensitive lands in the Big Hole, Beaverhead, and Centennial valleys to development: In 2006, BLM closed just 146,000 acres in the Dillon Field Office to oil and gas leasing, most of which are already closed to leasing by law (e.g., wilderness). Dillon ROD/RMP at 44. Sensitive areas left open to leasing and development include lands. For example, several federal leases are located adjacent to Rattlesnake Creek, which is part of the City of Dillon's water supply, and back up against National Forest lands in the Pioneer Mountain range which hosts critical wildlife and game corridors and habitat. Parcels near Glenn, Montana, would threaten noise, light, and sound pollution, not to mention the risk of wastewater or toxic substances and spills near headwaters of the Big Hole River, home of the last native population of fluvial Arctic Grayling and a key driver of the regional outdoors economy. Similarly, Parcels to the East of Dillon

back up to the Ruby Mountains Wilderness Study Area, key game and wildlife habitat, and would threaten the area's untrammelled, wild and scenic nature.

2. The Dillon RMP encourages speculative leasing: Not only does the Dillon RMP open wide swaths of sensitive land to development, it encourages speculation on hundreds of thousands of acres with little drilling potential. According to the Dillon RMP, the vast majority of the field office – about 1.2 million acres, or 86 percent – has low or very low development potential, and there are *no acres with high potential*. Dillon Proposed RMP/Final EIS at 226. A former geology professor at the University of Montana-Western has even found “with a high degree of confidence that the potential of finding and developing economic quantities of oil and natural gas at this location is so remote as to be negligible.”[2] Thus, it's entirely inconsistent with BLM's stewardship responsibilities to open so many lands to development when those lands lack real development potential and are so valuable for other uses such as hunting and angling or other outdoor recreation activities. A [recent economic report](#) conducted by the University of Montana Bureau of Business and Economic Research showed that outdoor recreation in Beaverhead County generates more than \$167 million each year for Montana's economy while creating over 1,400 jobs.

Further, when lands are so liberally left open to speculative leasing, there are on-the-ground consequences. We are watching this play out right now in the Tendoy Mountains, where a company with little track-record of drilling and almost no public profile has applied to drill on leases that were acquired noncompetitively and for the minimum bid of \$2.00/acre. And because BLM likely assumed that development would never occur within this area, the protections for fish, wildlife, and outdoor recreation within the Dillon RMP are wholly inadequate.

3. The Dillon RMP lacks adequate protections for other resources and values: We recognize that, since approving the Dillon RMP in 2006, BLM has strengthened certain protections for some wildlife species – in particular, Greater sage-grouse. However, the Dillon RMP is still deficient, in terms of safeguarding fish, wildlife, and other values from oil and gas development.

This deficiency is exemplified by the Tendoy Drilling Project, which BLM and the U.S. Forest Service are currently evaluating. The project is located within a highly sensitive area that includes “several designated crucial winter range and parturition areas” and “migration routes” for elk, mule deer, and other big game species, important habitat for Westslope cutthroat and other trout species, and popular recreation resources.[3] Yet, according to Montana Fish, Wildlife & Parks, the Dillon RMP does not afford these and other resources with sufficient protection, as the project could “negatively impact sage grouse and aquatic resources” and “have impacts on mule deer, bighorn sheep, and other wildlife species habitat and recreation opportunities.”[4]

In light of these flaws, as well as the administration's broader oil, gas, and conservation priorities for public lands, we feel there is ample justification to initiate a new land-use planning process for the purpose of reconsidering oil and gas management in the Beaverhead, Big Hole, and Centennial valleys. BLM recently acknowledged that such a process was warranted when, in conjunction with deferring several proposed leases in the Big Hole and Beaverhead valleys, it stated: "[t]he Dillon parcels were deferred because more analysis of resource concerns in needed to determine the adequate level of protection for the area." [5]

We are aware that BLM intends to initiate another planning process for Greater sage-grouse. To the extent that process encompasses federal lands in southwestern Montana, then it could serve as a vehicle for addressing the concerns identified in this letter. However, that process would need to address and resolve potential oil and gas conflicts with all of the important fish, wildlife, water, recreation, and other resources in the Beaverhead, Big Hole, and Centennial valleys – not just Greater sage-grouse.

We would welcome the opportunity to meet and discuss this letter with you and others at BLM. At your earliest convenience, please let us know if and when you are available.

Sincerely,

Alec Underwood
Senior Policy & Development Director
Montana Wildlife Federation
alec@mtwf.org

Guy Alsentzer
Executive Director
Upper Missouri Waterkeeper
guy@uppermissouriwaterkeeper.org

Aubrey R. Bertram
Staff Attorney
Wild Montana
abertram@wildmontana.org

Becky Edwards
Executive Director
Mountain Mamas
becky@mtnmamas.org

Scott Brennan
Montana State Director
The Wilderness Society

scott_brennen@tws.org

Whitney Tawney
Executive Director
Montana Conservation Voters
whitney@mtvoters.org

cc: Laura Daniel-Davis, Principal Deputy Assistant Secretary, Land and Mineral Management
Nada Wolff Culver, Deputy Director of Policy and Programs, Bureau of Land Management

[1] These valleys encompass approximately 900,000 acres of federal lands and minerals.[2] DOI, Meeting the Moment: Interior's Bold Action to Preserve Public Lands and Waters, Invest in Clean Energy Future (Feb. 9, 2021), *available at* <https://www.doi.gov/blog/meeting-moment-interiors-bold-action-preserve-public-lands-and-waters-invest-clean-energy>.

[2] Rob Thomas, *Oil and gas on White Pine Ridge not likely*, The Missoulian, July 25, 2021, *available at* https://missoulian.com/opinion/columnists/opinion-oil-and-gas-on-white-pine-ridge-not-likely/article_032b511a-d0ce-5d9b-9678-12808609461d.html.

[3] BLM & U.S. Forest Service, EA Tendoy Federal #13-1, White Pine Federal #18-1 67, 76, 93 (May 2021), *available at* https://www.fs.usda.gov/nfs/11558/www/nepa/103381_FSPLT3_5636815.pdf.

[4] Letter from Marina Yoshioka, Regional Supervisor, Montana Fish, Wildlife & Parks, to the Beaverhead-Deerlodge National Forest 1 (May 13, 2021), *available at* https://www.fs.usda.gov/nfs/11558/www/nepa/103381_FSPLT3_5637631.pdf.

[5] BLM, Montana/Dakotas March 27, 2019 Oil and Gas Lease Sale Response to Comments 6, *available at* https://eplanning.blm.gov/public_projects/nepa/114348/165531/201909/Appendix_F_Response_to_Comments.pdf.