



March 9, 2022

Dillon Field Office
Bureau of Land Management

Update Dillon Resource Management Plan to Protect Historical Uses and Water Resources

We, the undersigned area residents, associations and businesses, are requesting that the Dillon Bureau of Land Management (BLM) field office amend the area's Resource Management Plan (RMP) to remove the availability of public lands for fluid mineral leasing, ending the existential threat it poses to area residents and businesses, and ensure the plan is consistent with the current, cultural and historical uses in our region.

As it stands, our region, which is defined by river valleys, wilderness, forests, public lands, range land, wildlife and clean water, is facing unresolved conflicts between speculative oil and gas leasing and development. Across the federal public lands within the Big Hole, Beaverhead, and Centennial Valleys, oil and gas companies can lease and potentially develop some 90% of those lands, threatening all area residents and landowners as well as visitors and our outdoor heritage. Oil and gas leasing and development is not consistent with the historical, cultural, and current uses in the region, nor is it consistent with BLM's multiple use mandate to 'utilize the land in a balanced combination that will best meet the needs of the people for current and future generations.'

Recent economic analysis by the University of Montana's Bureau of Business and Economic Research found that hunting and angling in Beaverhead County generates more than \$167 million each year for Montana's economy and was responsible for the creation of over 1,400 jobs, many of which are local, accounting for nearly 13% of the county's entire workforce. Beaverhead County is also home to nearly 500 family farms and ranching businesses, generating \$147 million in gross revenue and \$31 million in realized farm income in 2021 alone. Family farming and ranching and outdoor recreation sustain the foundation of our communities and are worth far too much to put at risk for speculative oil and gas leasing and development.

At the core of this region's economic success is our clean water resources. The wetlands, creeks, streams, rivers and reservoirs across the region are its lifeblood, recharging groundwater and providing clean drinking water for our communities, wildlife, and livestock alike. Clean, cool water enables a vibrant aquatic community that allows residents and countless visitors to catch wild trout in one of the last remaining intact cold-water fisheries in the lower 48. These waters are also home to one of the last remaining populations of the threatened fluvial Arctic Grayling.

Last, Best River.

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EIN#: 36-3644051



Despite the current Dillon RMP identifying that about 1.2 million acres, or 86 percent, of the eligible lands have low or very low development potential, with no acres with high potential, oil and gas leasing and speculative development continues, and is actively encouraged by the BLM. An independent assessment by a retired geology professor at the University of Montana-Western came to the same conclusion as the BLM, finding that “with a high degree of confidence that the potential of finding and developing economic quantities of oil and methane gas at this location is so remote as to be negligible”. BLM’s own record identifies proposed lease locations in these watersheds as poor investments that offered limited oil and gas potential, but would cause significant pollution to the watershed.

As you know, this isn’t an abstract threat to our communities and our region’s economic drivers. Oil and gas companies have nominated leases in both the Big Hole and Beaverhead watersheds, only to be deferred after local public outcry and known existing deficiencies within the RMP identified by the BLM. In the Tendoy Mountains, a leaseholder with little development experience or track record is attempting to move forward with speculative, exploratory hydraulic fracking drilling, which would produce thousands of gallons of toxic and contaminated wastewater. Due to the deficiencies of the current RMP, the company acquired the leased area noncompetitively for just two dollars per acre, with very limited guarantees the area would be reclaimed under currently deficient bonding requirements. The Tendoy Mountains have been identified as critical winter range habitat and a migratory corridor for elk, mule deer, and bighorn sheep. The Tendoy feeder streams, creeks, and wetlands fill our rivers, reservoirs and recharge groundwater, providing vital habitat for the native Westslope Cutthroat, other wild trout species, and countless other species important to our region’s ecosystem.

Considering fluid mineral recovery of material worth is highly unlikely and negligible, known existing deficiencies in our region’s RMP, and the negative externalities that would detract and materially harm our region’s economic pillars, we respectfully request that the Dillon BLM field office initiate the process to propose an amendment to remove fluid mineral recovery from the plan. We are open to having additional conversations with National, State, and Dillon field office BLM staff to address our concerns and ultimately amend and rectify the current RMP regarding the threat of oil and gas development to our livelihoods and way of life.

Sincerely,

Brian Wheeler
Executive Director

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