



Ms. Nora Rasure  
Intermountain Regional Forester  
324 25<sup>th</sup> St.  
Ogden, UT 84401

January 21, 2015

Dear Ms. Rasure,

I write to thank you and your staff for taking the time to meet with Steve Robertson, Mike Burd, Dan Smitherman and me earlier this month to discuss the long-contested oil and gas leases in the Wyoming Range. We are pleased to know the supplemental draft EIS is likely to be released this April and we look forward to the Forest Service's decision regarding these leases.

As you know, energy development is by far the largest sector of Wyoming's economy. In fact, Wyoming is the second-largest producer of energy in the United States. If Wyoming were a country, it would rank 10th in the world in energy production. People in Wyoming are proud of this and are fully aware of the jobs and revenue streams these industries bring to our state.

As we mentioned in our meeting, however, it is difficult to identify supporters for new oil and gas leasing in the Wyoming Range. Other than the high bidding companies themselves, we know of nobody actively advocating this development. An overwhelming majority of citizens and leaders with a diverse array of backgrounds, politics, and interests has repeatedly and passionately spoken up over the years and has clearly stated that the Wyoming Range is special.

When the Forest Service announced its decision to consent to lease in the Wyoming Range ten years ago, an unprecedented, diverse and bipartisan coalition came together. We worked to secure passage in 2009 of the Wyoming Range Legacy Act—federal legislation that withdrew 1.2 million acres from future oil and gas leasing. Three years later, many of these same citizens came together again to find a solution to a drilling proposal in the Wyoming Range. More than 1,000 individuals contributed to what became the \$8.75 million needed to purchase PXP's oil and gas leases, which were directly adjacent to the northern block of these still contested 41,500 acres.

The reason for this citizen support is that while the people of Wyoming appreciate the revenue that oil and gas development brings to our state, at the same

time, we have witnessed the documented declines in wildlife populations as high quality winter range habitat is transformed into industrial gas fields. Some days the air quality in Sublette County (one of Wyoming's least populated counties, but home to two of the largest gas fields in the country) is worse than the worst smog days in Los Angeles, Denver or Houston. There are also documented impacts to water from oil and gas development. Benzene, a known-carcinogen, has been found in more than 80 water wells in and around the Pinedale Anticline gas field.

Because there are both benefits and costs, people in Wyoming have often supported the idea of "development on Wyoming's terms." This means ensuring development is done right in places where it's appropriate and leaving some places the way they are. Finding a balance and making determinations about whether and to what extent oil and gas development is appropriate on any given landscape means looking at the issue from many angles. In the case of the Wyoming Range, considering the many angles—whether it's economics, wildlife, recreation or public opinion—there is no question that the right decision is not to lease.

Future oil and gas development on these Wyoming Range parcels will never offer the kind of significant revenue or domestic energy supply that other fields in Wyoming are generating or are projected to generate. The prior draft EIS considered 27 wells on the 44,720 acres as the reasonably foreseeable development scenario. It is likely even fewer wells are projected for the now-reduced 41,500 acres. In contrast, thousands of wells are already in existence in the Pinedale Anticline and Jonah Fields, and thousands more are proposed in Wyoming: Moxa Arch (1,861 wells), Moneta Divide (4,200 wells), Normally Pressured Lance (3,500 wells), Hiawatha (4,208 wells), Converse County (5,000 wells), Continental Divide-Creston (8,950 wells), Gun Barrel-Deep Madden (1,470) and the LaBarge Platform (838 wells).

Yet, for as insignificant as some 27 wells are in Wyoming's energy portfolio, industrial oil and gas development even at a small scale threatens to change the character of the Wyoming Range and degrade the values that make it special. When it comes to a world-class forest like the Bridger-Teton, we are concerned that the creation of a handful of temporary oil and gas jobs threatens to harm numerous already thriving, diverse and sustainable businesses in Sublette County's recreation and tourism sector and in the ranching community.

When people talk about wildlife habitat in the Wyoming Range they use superlatives: It is the best moose habitat in Wyoming (supporting 40 percent of the state's moose population); it is the last core conservation habitat for the native Colorado River cutthroat trout (only 13 percent of its historic range exists today and all of it is within the northern portion of these contested leases); and it provides transitional and stopover habitat for mule deer herds (herds that have been documented traveling some 150 miles one-way in what has been shown to be the longest mule deer migration anywhere in the world.)


In addition to wildlife values, or perhaps in large part because of them, the Wyoming Range is a place people love. It's a place where generations of Wyoming families have returned year after year to their hunting camps, a place where young people get their first elk or deer, where the fishing is second to none, where you can find solitude despite the easy access, where outfitters make a living guiding out-of-state visitors, where ranching is a proud tradition and still provides livelihoods, and where an outdoor leadership school finds a landscape on par with any of its other international classrooms. It's a place worth fighting for and for 10 years that's what people in Wyoming have done.

On balance, there is simply no good reason to manage the Wyoming Range for oil and gas development. To do so would threaten the highest and best uses of a landscape Wyoming people and the country as a whole have identified as far too important for other uses and values. And as illustrated in the economic data we shared with you in the meeting, the sustainable wildlife, recreation, outfitting, ranching, hunting and angling revenue the Wyoming Range generates annually outshines even the most optimistic estimates from potential oil and gas development.

Attached to this letter is a list of just some of the many diverse businesses and organizations that supported the Legacy Act. The Forest Service may remember too that, the EIS that analyzed PXP's drilling proposal in the Wyoming Range's Upper Hoback Basin garnered more comments than any other project in the Bridger-Teton's history. We hope this information sheds even more light on why the Wyoming public wants to keep the Wyoming Range the special, undeveloped place it is today—now and for future generations.

Thank you for your consideration,

Sincerely,



Lisa McGee  
Program Director

cc: Chris Iverson – Deputy Regional Forester  
Nan Christianson – Deputy Regional Forester  
Chris Hartman - Director of Recreation, Wilderness and Heritage  
Jose Castro – Acting Director of Lands and Minerals  
Kathryn Conant – Interim Bridger-Teton NF Supervisor