

"VARIETY IN HUNTING AND FISHING"

## NORTH DAKOTA GAME AND FISH DEPARTMENT

100 NORTH BISMARCK EXPRESSWAY BISMARCK, NORTH DAKOTA 58501-5095 PHONE 701-328-6300 FAX 701-328-6352

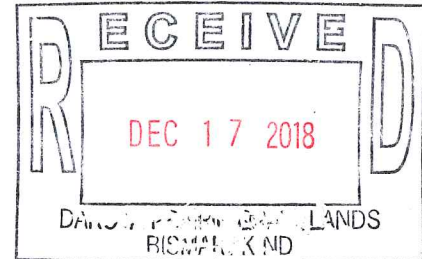
GOVERNOR, Doug Burgum

DIRECTOR, Terry Steinwand

DEPUTY, Scott A. Peterson

December 11, 2018

William O'Donnell  
Grasslands Supervisor  
2000 Miriam Circle  
Bismarck, ND 58501



Subject: Draft Supplemental Environmental Impact Statement for Oil and Gas Leasing

Mr. O'Donnell,

The North Dakota Game and Fish Department received notice of the availability and request for comments on the Northern Great Plains Management Plans Revision Draft Supplemental Environmental Impact Statement for Oil and Gas Leasing in late October. Because of concerns founded on the exceedingly short commenting period, the Department reached out to Casey Johnson on November 1<sup>st</sup>. During this phone call we expressed our concern that the Forest Service would likely not receive meaningful comments from the Department, or other stakeholders for that matter, as 45 days was an insufficient amount of time to thoroughly review the almost 200 page document, understand its connection to the 2001 Grassland Plan and the 2003 Decision for Oil and Gas Leasing on the Little Missouri and Cedar River National Grasslands, and analyze its strengths and weaknesses. Unfortunately, at that time an extension was denied.

The Forest Service began development of the Supplemental Environmental Impact Statement in 2012. The process has been halted and restarted numerous times and, subsequently, has taken 6 years for the draft EIS to be ready for release. Although a 45 day comment period may be routine for other EIS input, it is far from adequate or reasonable in this case. This document will guide oil and gas development on all remaining available land within the Little Missouri National Grasslands, over 200,000 acres, and warrants extensive review and input from all invested stakeholders. To appropriately review this document in its entirety and provide valuable comments, the Department would need to gather input from a number of biologist who focus on a range of topics from Sage Grouse to native prairie management. This requires a significant amount of staff time and coordination.

So that the Department can provide meaningful feedback based on the best science available, we again respectfully ask that the comment period be extended to 180 days, or a total of 6 months. This document will offer important guidance on oil and gas development for the foreseeable

future, and as that development has the ability to greatly affect our state's trust resources, it is vital that the Department has a reasonable amount of time to provide feedback.

Thank you for your time and consideration of our request. We look forward to providing consequential feedback on the draft EIS should an extension be granted.

Sincerely,

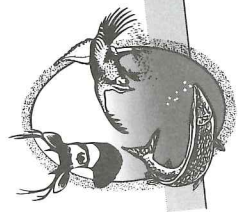


Greg Link  
Chief, Conservation and Communication Division

Cc: Governor's Office  
North Dakota Industrial Commission  
The North Dakota Chapter of the Wildlife Society  
Mule Deer Foundation  
Rocky Mountain Elk Foundation  
Backcountry Hunters and Anglers  
The Badlands Alliance  
North Dakota Natural Resources Trust  
North Dakota Wildlife Federation

U.S. POSTAGE  
ZIP 58504 \$000  
02 4W  
0000340427 DEC 13 2018  
PRESORTED  
FIRST CLASS

RECEIVED  
DEC 17 2018  
DANIEL J. BURK  
BISMARCK, ND



"VARIETY IN HUNTING AND FISHING"  
NORTH DAKOTA GAME AND FISH DEPARTMENT  
100 NORTH BISMARCK EXPRESSWAY BISMARCK, NORTH DAKOTA 58501-5095 PHONE 701-328-6300 FAX 701-328-6352

William O'Donnell  
Grasslands Supervisor  
2000 Miriam Circle  
Bismarck, ND 58501

WILSON  
H DAKOTA 58501-5095 PHONE 701-328-6300 FAX 701-328-6352

RECEIVED  
DEC 17 2018  
DANIEL J. BURK  
BISMARCK, ND

GOVERNOR, Doug Burgum  
DIRECTOR, Terry Steinwand  
DEPUTY, Scott A. Peterson

### Statement for Oil and Gas Leasing

notice of the availability and request for  
Comments Revision Draft Supplemental  
in late October. Because of concerns  
Department reached out to Casey  
expressed our concern that the Forest  
from the Department, or other  
amount of time to thoroughly review  
to the 2001 Grassland Plan and the  
Little Missouri and Cedar River National  
Unfortunately, at that time an extension

Environmental Impact Statement in  
cases and, subsequently, has taken 6  
day comment period may be routine  
in this case. This document will guide  
in the Little Missouri National  
and input from all invested  
community and provide valuable  
number of biologist who focus on  
management. This requires a significant

So that we can provide meaningful feedback based on the best science available, we  
again respectfully ask that the comment period be extended to 180 days, or a total of 6 months.  
This document will offer important guidance on oil and gas development for the foreseeable