

Data Submitted (UTC 11): 1/7/2024 7:00:00 AM

First name: Larry

Last name: Moyer

Organization:

Title:

Comments: I have several questions regarding the Thompson Divide Withdrawal. 1. Was this Withdrawal considered as part of the Draft Resource Management Plan Supplemental Environmental Impact Statement Colorado River Valley Field Office and Grand Junction Field Office that resulted from the "Sue and Settle" method of land management? 2. How does the Thompson Divide Withdrawal tie in with prior BLM scoping efforts where at least one scoping meeting was held in DeBeque Colorado? 3. How is one expected to understand the Withdrawal without sufficient maps? I believe this promotes ignorance. Accordingly, I challenge the ignorant comments people that do not understand the location of the Natural Gas Pipelines going through the Withdrawal Area because maps are not provided. Citizens are entitled to informed comments, but no one is entitled to be ignorant. 4. Is the Thompson Divide Area an invented area? Just as Heath & Heath, 2007 note in the book Made to Stick, The Nature Conservancy representative is quoted "We're always laughing now, because we see other people's documents and they're talking about the Mount Hamilton Wilderness. We say, 'You know we made that up.'" Well, You can fool the Tourists and the New Transplants, but we live here. Do the Globalists and A-listers on the ground in one of the scenes in the next image scanned from the December 2023 Travel & Leisure Magazine understand that the natural gas used to heat the buildings comes through the Thompson Divide Area?

The most significant change that I can recommend is the need for audited financial statements of each BLM Resource Management Area with correct Cost Accounting methods to allocate all costs. For instance, was The Wilderness Society or any Wilderness Society members or any environmental organization paid anything for the characterization of the wilderness lands or paid to prepare the DRMP? How much has been paid to the Wilderness Workshop and the Center for Biological Diversity in association with the litigation driving this plan change? For any kind of responsible stewardship and transparency, audited financial statements that properly account for all costs by BLM Area are mandatory. This includes costs paid by the Department of Justice. In fact, is it not reasonable to expect the financial statements to meet the requirements of the Securities and Exchange Commission for Public Companies?.

The Draft Resource Management Plan document needs correcting in that it is not possible to reasonably follow and understand the reasons for the differences between Figure 1.8-3. Oil and Gas Development Potential in the Decision Area and Figure 2.6-1 Alternative E, Open and Closed to Fluid Mineral Leasing for areas open to leasing. Where are the maps? Text in tables is inadequate to fully understand things.

A critical correction is to realize that the DRMP 1.5.1 Reasonable Foreseeable Development on page 1-2 statement [Idquo]The BLM determined the two RFDs remain valid. The RFDs are based on geology, which remains constant, and the RFDs considered both conventional and Mancos Shale development.[rdquo] is flawed and not in touch with truth and reality.

The Draft Resource Management Plan document needs correcting in that it is not possible to reasonably follow and understand the reasons for the differences between Figure 1.8-3. Oil and Gas Development Potential in the Decision Area and Figure 2.6-1 Alternative E, Open and Closed to Fluid Mineral Leasing for areas open to leasing. Where are the maps? Text in tables is inadequate to fully understand things.

As a matter of fact, how is it that Medium Potential (green) areas are present west of Collbran and DeBeque on Figure 1.8-3, with high potential on to the west? Where is the data to Reconcile the maps to the USGS Resource Assessments?

A companion to the price system is the concept of opportunity cost. Private property lies at the foundation of market economies because without private property, and the exchange (willing exchange, I might add) it fosters,

people would be unable to consider the full costs of their decisions. The failure of the BLM to consider opportunity costs in the DRMP is a glaring flaw.

How are the Areas of Critical Environmental Concern weighed against the value of oil and gas from the lands.

The tables in Section 3.6.3 in the original RMP look to be incomplete and I would ask why there are no figures for oil and gas workers. This looks to be an important piece of missing data.

IMAGE: Map presented at DeBeque Scoping Meeting - page 26 of 68

IMAGE: Map Presented at DeBeque Scoping Meeting - page 26 of 68

The Environmental Groups sued to stop the Bull Mountain Pipeline above. I believe Pitkin County was also involved with litigation against the oil and gas industry and leasing. Guess What??? There were two pipelines missing from the Thompson Divide Coalition Map. They both go through the sacred [ldquo]Thompson Divide[rdrquo] area.

Pipeline Company System Map (Cropped) pg 27 of 68

Well Base Map showing Thompson Divide Area presented at the DeBeque Scoping meeting pg 27 of 68

Within the context of publishing audited financial statements, the details of payments to environmental organizations must be disclosed. If the environmental organizations are [ldquo]just doing their business[rdrquo] as I was told, then some disclosure and transparency is in order, and their membership lists, financial statements, and donor records should be made public.

The BLM should transfer ownership of the severed minerals to the current surface owners. If that doesn[rsquo]t happen, then the BLM should voluntarily split the revenue with the surface owner obtaining 25% and the county 25%.

The payments from Oil and Gas Leasing Bonus, Rentals, and Royalties from Federal Lands and Minerals must go to counties, not to the State. In Colorado, a [ldquo]City State[rdrquo] this is very critical.

While the application of Best Practices and Certifications in the oil and gas industry is an ongoing and positive trend, should it not be also applied to the BLM as well? I do not find a geologist or engineer in the list of RMP preparers. What[rsquo]s up with that? I would think that since there are places where private mineral rights and private surface are involved with the Federally Regulated operations that it would be important to have properly credentialed personnel involved. Some of the BLM staff are practicing engineering in Colorado without a license. It is not a Best Practice to hide behind sovereign immunity to avoid responsibility and liability. As a courtesy to Colorado, the BLM should use Registered Engineers and Certified Petroleum Geologists.

I believe that the listing of the Sage Grouse is being used as a stalking horse by the environmental industry to cripple the oil and gas industry. Just as the Spotted Owl was used decades ago to destroy the timber industry in the Northwest, I believe the Sage Grouse efforts are based on incomplete or flawed science and reasoning.

I believe that the wilderness character assessments are not consistent with the customs and culture of the residents of Northwest Colorado. For many years the BLM has coordinated with environmental organizations, as noted on page 3-145 in original RMP for developing the wilderness inventories. Have the evaluators that determined the wilderness character for the areas in the book cliffs received proper diversity training on the [ldquo]Custom and Culture[rdrquo] of Mesa County? Not many of us believe that we are in a [ldquo]wilderness[rdrquo] area when we have the dust from the road blowing in our face. This points to a real

problem in that there are no metrics for what is wilderness. For instance, how far from a road must one get?

With the command to provide additional air quality analysis, please make the analysis comprehensive to cover all sources of air quality degradation, not just oil and gas.

There is also a need for the DRMP to realize the impact of Methane Emissions and understand that the Adsorption Spectrum for Methane is in the same range as that for Water Vapor. There is 10,000 times as much water vapor in the atmosphere as there is methane, so the methane contribution to the [ldquo]Green House Effect[rdquo] is not significant.