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1/15/2019

William P. O'Donnell
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RE: Northern Great Plain Management Plans Revision
Draft Supplemental Environmental Impact Statement for Oil and Gas Leasing

Mr. O'Donnell:

On behalf of Petro-Hunt, LLC (Petro-Hunt), we appreciate the ability to comment on the draft SEIS. Petro-Hunt also appreciates the amount of time and effort it takes to produce a draft SEIS of this magnitude, and that completion of said SEIS will improve the efficiency of oil and gas activities on the Dakota Prairie Grasslands.

The supplemental EIS has proposed the following three alternatives for unleased federally owned minerals that are within the Little Missouri National Grasslands where both surface and minerals are federally owned:

- Alternative 1 – Continue leasing with current stipulations
- Alternative 2 – No new oil and gas leasing
- Alternative 3 – Continue oil and gas leasing with revised stipulations and lease notices

Petro-Hunt views Alternative 2 as unacceptable. If Alternative 2 is adopted it would lead to unorderly development, stranding of federal, state, and fee owned minerals and drilling & completion of unnecessary wells. USFS is a multi-use agency and this alternative would be significantly detrimental to efficient production of federal leases.

Alternative 3 introduces new and revised stipulations/notices that were developed to comply with current law and to provide additional protections for resources of concern. Petro-Hunt has the following concerns with, and seeks further clarification on, Alternative 3:

- Alternative 3 increases no surface occupancy (NSO) by 43% to 107,800 acres. It appears that the largest increase is a new stipulation of no surface occupancy in inventory roadless areas. It is stated on pg. 7 of the SEIS that “*Historically, no surface occupancy has been permitted for mineral estate within inventoried roadless areas, based on lease notices. However, codifying this protection in the*

lease stipulations strengthens it.” Petro-Hunt does not agree with this assessment. There are existing roads in the inventoried roadless and currently new pads can be built within existing road disturbance. Petro-Hunt is not in favor of any blanket stipulation that increases NSO in Roadless Areas. Will the addition of a well to an existing pad within a Roadless Area be approved under this alternative if there is no new disturbance?

- Alternative 3 proposes to add “*no new surface occupancy allowed within 200 feet of mapped populations for Dakota buckwheat, nodding buckwheat, and sand lily.*” Petro-Hunt is concerned that the USFS will be reducing the authority of the authorized officer by creating an NSO for these species.
 - For example, if the new NSO requires a proposed road to be shifted due to proximity to the species, consequently adding an additional 500’ of road be built across native ground to avoid species, the authorized officer should retain ability to choose the least detrimental alternative to all resources. If moving the road within the proposed 200’ NSO will not impact the species community and create less total disturbance than re-routing roads, the USFS should not limit their ability to choose.
- Alternative 3 proposes new stipulations for NSO within sites classified as Recreation Site Development Scale 3 through 5. As of 2018 these sites included: Birt Hills Interpretive Site, Burning Coal Vein, Buffalo Gap, Sather Lake, CCC Campgrounds and Summit, Whitetail Picnic Areas, and the four Maah Daah Hey Trail overnight camps, Wannagan, Elkhorn, Magpie, and Bennett. This stipulation applies to all recreation sites whose development scale is classified as 3, 4, or 5 at the time of leasing. Alternative 3 also adds a timing limitation where surface use is prohibited from 5/1 – 12/1 within ¼ mile of the established boundaries of sites classified as Recreation Site Development Scale 3 through 5.
 - Petro-Hunt would like clarification on Table 1 of the DPG DSEIS for Oil and Gas Leasing: Executive Summary, for the NSO & TL on for Developed Recreation Sites, under Alternative 3 “*Specific Sites Named and **Future Sites Included** for Development Scale 3-5.*” This table appears to include future sites which contradicts the Draft SEIS document where it appears to include only established sites, or sites determined at the time of leasing. Does adding “future sites” create blanket coverage on all future leases?

Petro-Hunt appreciates the ability to comment on the draft SEIS. Alternative 2 all but eliminates future development of federal leases ultimately affecting the people of the United States. Alternative 3 adds unnecessary NSO stipulations while reducing the authority of the authorized officer to make a decision that causes the least amount of disturbance. Petro-Hunt’s stance is to continue current stipulations under Alternative 1.

Regards,

Derek Enderud
Regulatory, Environmental & Safety Director