



Dakota Resource Council
1720 Burnt Boat Dr., Ste 104
Bismarck, ND 58504

January 16, 2019

William O'Donnell, Grasslands Supervisor
Attn: Oil and Gas Development SEIS
2000 Miriam Circle
Bismarck, ND 58501

RE: Oil and Gas Leasing Draft Supplemental Environmental Impact Statement (DEIS), Northern Great Plains Management Plans Revisions

Dear Grasslands Supervisor O'Donnell,

Dakota Resource Council is a member driven, grassroots organization that has advocated for responsible development of North Dakota's resources for forty years. We have members who live, work and play in western North Dakota, all of whom are impacted by management decisions made regarding oil and gas development in and around the Little Missouri National Grasslands.

Though appreciative of 30-day extension of the original 45-day public comment period we do not feel, even with the extension, that the public had enough time to thoroughly examine all 194 pages of the document, let alone write comprehensive comments. Further, the government shutdown impeded the public's ability to get the DSEIS documents and limited access to the United States Fish and Game staff to ask questions and gather information regarding this document. This includes the oft malfunctioning website <http://www.fs.usda.gov/project/?project=40652> that said it was "unavailable" and directed people to contact the local USFS staff. Staff that is unavailable during the shutdown. In light of these barriers to the public getting critical information, including the document itself, we ask that the comment period be extended.

DRC opposes Alternative 1: Continuing leasing with current stipulations

DRC opposes Alternative 2: No new leasing

DRC believes that this would encourage development on the patchwork of adjacent state and private lands adversely impacting the surface of Little Missouri National Grasslands.

DRC opposes Alternate 3: Continued leasing of federal minerals but with stipulations

An approach with much more detailed language ensuring a comprehensive management rather than the piecemeal approach this method encourages is needed. Details regarding land that is already leased, new road placement, reclamation, and flaring to mention just a few items need to be better thought out to prevent the further damage of the surface of the LMNG and the increase of future emissions from oil and gas leasing of minerals under USFS land.

DRC's proposed Alternative:

We propose that all unleased Forest Service land be withdrawn from consideration for oil and gas development. Once the land is withdrawn, we propose that an inter-agency, multi-jurisdictional planning process be initiated. The planning process should weigh the overall environmental impacts of all ongoing oil and gas development on private and state lands.

Thank you,

A handwritten signature in dark ink, appearing to read 'Scott Skokos', followed by a long horizontal line extending to the right.

Scott Skokos

Executive Director, Dakota Resource Council