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First name: Gary

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Organization:

Title:

Comments: Ms. Susan Elliott

Minerals Program Manager

Ruby Mountains Ranger District

660 S. 12th Street, Suite 108

Elko, NV 89801

RE: Ruby Mountains Oil and Gas Leasing Availability Analysis

Dear Ms. Elliott:

Please accept this letter as comment on the Humboldt-Toiyabe National Forest's Mountain City-Ruby Mountains-Jarbridge Ranger District proposal to make approximately 54,000 available for leasing in the Ruby Mountains. As a Cabin owner in the Thomas Canyon Recreational Residence Tract (Lamoille Tract), I have an interest in the land management decisions with respect to the Ruby Mountains.

As I understand the action that is being proposed, the U.S. Forest Service (USFS) is to determine: 1) which National Forest System (NFS) land may be made administratively available to the Bureau of Land Management (BLM) for oil and gas leasing, and 2) what stipulations would be included in any leases to protect resources associated with these lands.

With regard to the first part of this action, it would only seem reasonable to make lands available to oil and gas leasing if there is some indication that the lands may have a high potential for the presence of oil and gas? Recent drilling on adjacent lands by Noble Energy and perhaps by others, has not resulted in any oil and gas development. This indicates that the oil and gas resources are either not sufficient to allow for development/extraction, or the quality of the oil and gas is low. If the lands have low potential for successful and economical extraction, or the quality of the oil and gas is low. If the lands have low potential for successful and economical extraction of oil and gas, then the USFS should not make the lands available for lease.

If, however, the potential for oil and gas resources is high, then the lands should be made available for lease with appropriate stipulations for protection of the resources associated with these lands.

This is basically a simple risk-reward analysis. Making low reward (i.e., low potential for oil and gas discovery) lands available creates a high risk to resources (i.e., the scenic value of the Ruby Mountains), even with stipulations. Making low potential or low reward lands available for leasing is not a reasonable action. While the administrative action of making the lands available to leasing does not in and of itself create any environmental impact, such an action does open the door for potential environmental impacts if the lease leads to exploratory drilling. Therefore, if the lands have low potential for oil and gas, then there is no reason to make the lands available for leasing.

Therefore, please include in the Environmental Assessment (EA) an Alternative Action that includes only the lands with high potential for oil and gas resources.

As for the second part of this action, that of determining stipulations to protect resources, the stipulations that are under consideration are a good start, but fall short of protecting some resources. Please consider the following:

No Surface Occupancy Stipulation for:

- \* Ecological Sites and Soils with high potential for erosion
- \* Ecological Sites and Soils with shallow depth to bedrock
- \* Aspen, mahogany, and other forested areas over 1-acre in size

Timing Limitation Stipulation for:

- \* Operation and travel during periods of snow cover and/or saturated soils

The rationale for these stipulations is that impacts to water, vegetation, wildlife, and recreation are all likely to occur if soils are eroded or operation on shallow soils results in mass failure on slopes (even slopes less than 40%). The eroded soil will move to streams, degrading water quality and fish habitat; the loss of soil will impact plant communities and also the habitat for various wildlife species. No surface occupancy for large forested tracts is suggested to reduce fragmentation of these large tracts to maintain the ecological functions and wildlife habitat values that these forested areas offer. Operation on snow covered soils or saturated soils results in compaction and increased runoff and associated erosion associated with travel routes. There should also be stipulations to include road berms, sediment basins, and other design features to control runoff and erosion. Stipulations for reclamation of access roads, drill pads, and other associated facilities should include native grasses and forbs that are present in the area to promote shrub and tree re-colonization of the areas where trees and shrubs are removed.

Please include me (at the address and/or e-mail address on this letter) on all future public notices regarding the EA and lease sales associated with these lands.

Sincerely,

Gary N. Back