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First name: James

Last name: Miller

Organization: LPP Resources Limited Partnership

Title: General Partner

Comments: I am writing on behalf of LPP Resources LLC to provide comments on the Draft Environmental Assessment for the Newberry Geothermal Consent to Lease Project. As the owner of a 157-acre patented mining claim inside the caldera of the Newberry National Volcanic Monument, as well as an existing geothermal leaseholder on the volcano's southeast flank, our partnership has a deep, long-standing interest in both the preservation of Newberry Crater and the responsible development of its geothermal energy.

We support the Forest Service moving forward with leasing the nominated acreage, but we ask that you reconsider withholding the two parcels totaling 4,795 acres within the Special Management Area. Instead, we urge you to include those parcels under strict No Surface Occupancy stipulations.

The heat resource at Newberry is centered beneath the caldera and the adjacent Special Management Area, where deep drilling has proven temperatures above 300 degrees Celsius. With modern directional and closed-loop drilling, an operator does not need to disturb the surface of the Special Management Area. Drill pads can be placed entirely on regular forest lands outside the boundary, with wells drilled vertically and steered laterally thousands of feet underground. Applying No Surface Occupancy gives the Forest Service complete legal protection over the surface while ensuring the clean energy resource is not unnecessarily stranded.

In parallel with this leasing process, LPP Resources would like to formally propose a federal land exchange. Our 157-acre patented claim in the caldera includes both private surface and mineral rights. It has existed as a private in-holding since before the monument was created in 1990. We propose conveying this entire 157-acre property to the United States Forest Service so it can be added to the monument and permanently protected from mining or private development. In exchange, we request the issuance of perimeter BLM geothermal leases, specifically including the subsurface rights to the Special Management Area parcels under No Surface Occupancy stipulations. Trading an active private mining in-holding inside the caldera for deep, zero-surface-impact subsurface leases outside the monument resolves a decades-old land management problem and benefits everyone involved.

We ask that the Forest Service include the 4,795 acres of Special Management Area parcels with No Surface Occupancy stipulations in the final Decision Notice, and that staff begin discussions with LPP Resources and the BLM regarding the proposed caldera exchange.

Thank you for your consideration and for your work on the Deschutes National Forest.

Sincerely,

James A. Miller

General Partner, LPP Resources LLC