

March 9, 2018

Mr. Mike Robinson  
BLM Casper Field Office  
2987 Prospect Drive  
Casper, Wyoming 82604  
[blm\\_wy\\_casper\\_wymail@blm.gov](mailto:blm_wy_casper_wymail@blm.gov)

**Re: Converse County Oil and Gas Project DEIS**

Dear Mr. Robinson:

The Independent Petroleum Association of America (IPAA) appreciates the opportunity to submit comments regarding the Converse County Oil and Gas Project Draft Environmental Impact Statement (DEIS) and urges the BLM to adopt the Preferred Alternative (Alternative B). We also urge the agency to issue a Final Environmental Impact Statement (FEIS) and Record of Decision (ROD) before the end of 2018.

IPAA is the leading, national upstream trade association representing oil and natural gas producers and service companies. IPAA represents thousands of independent oil and natural gas explorers and producers, as well as the service and supply industries that support their efforts. Many IPAA member companies actively produce oil and natural gas from leases on federal lands in Wyoming and throughout the Intermountain West.

The Converse County Oil and Gas Project will generate significant economic benefit for the State of Wyoming and the federal treasury. The project deploys the latest horizontal drilling techniques to recover oil and natural gas resources with limited surface disturbance and habitat fragmentation. IPAA supports BLM's preferred alternative for the project and believes this approach makes the most sense in order to protect wildlife and allow reasonable exploration and development opportunities for companies operating in the area on a year-round basis. Year-round exploration and development is a crucial aspect of the Proposed Action and provides for less overall surface disturbance, fewer rig moves in the field and reduced vehicle traffic throughout the area. All of these benefits translate to reduced air emissions and potentially fewer traffic accidents, leaks and spills.

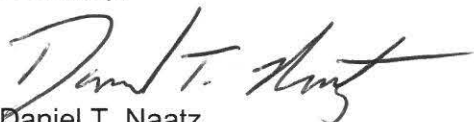
Oil and gas operators have been working with the BLM on this project for many years. Extensive air modeling, groundwater modeling and resource evaluations took place over a three-year period before the completion of the DEIS in 2017. The complex ownership pattern in the area, where only 10 percent of the surface estate is owned by the federal government, but 65 percent of the minerals are federal, provides implementation and operational challenges for producers. This is especially true as it relates to compliance with the National Historic Preservation Act and the BLM permitting process for split estates and federal land ownership patterns. BLM has not clearly identified in the project how programmatic timing stipulation relief will be administratively managed and it is vital that the agency clearly describe the process it will use to process APDs that request timing stipulation relief.

Finally, IPAA wants to outline our significant concerns regarding the Conservation Alternative (Alternative C) proposed by the BLM. Alternative C does not provide a reasonable path for implementation since it artificially mandates the number of wells drilled per pad, eliminates drilling in core sage grouse habitats that have active leases and attempts to promote infrastructure development outside the agency's permitting authority. BLM has not adequately described a number of issues associated with the impacts of Alternative C and we strongly urge BLM to not consider this option as part of the FEIS.

IPAA welcomes the Trump Administration's efforts to make American energy dominance a cornerstone of Administration policy. However, the current regulatory process at the BLM hampers that important goal. The Converse County Oil and Gas Development Project and specifically Alternative B, provide the necessary tools for the agency and oil and gas producers to move forward on a plan that will create significant economic benefit to the State of Wyoming while at the same time protecting wildlife and the surrounding environment. IPAA strongly urges the agency to adopt Alternative B and issue the FEIS by the end of 2018.

Thank you for the opportunity to submit comments on these important issues and do not hesitate to contact us if you have additional questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Daniel T. Naatz". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Daniel T. Naatz  
Senior Vice President, Government Relations  
Independent Petroleum Association of America