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October 9, 2017

Caleb Hiner, BLM Field Manager
Pinedale Field Office
P.O. Box 768
1625 W. Pine St.
Pinedale, WY 82941

Submitted electronically at blm_wy_prmp_pxp@blm.gov

Re: RMP amendment for 5,120 acres of split-estate land in Upper Hoback

Dear Mr. Hiner,

On behalf of the Wyoming Outdoor Council, I appreciate the opportunity to submit comments on the Bureau of Land Management's proposed amendment to the Pinedale Resource Management Plan that will address the 5,120 acres of federal minerals underlying private land in the Upper Hoback. The Wyoming Outdoor Council is the state's oldest independent conservation organization. We've worked for fifty years to protect Wyoming's environment and quality of life for future generations.

When we submitted scoping comments in 2014, we were pleased with the direction the BLM was heading. Its proposal was to make these 5,120 acres unavailable for future oil and gas leasing for the life of the RMP. As the BLM's press release correctly explained, concerned citizens raised \$8.75 million to enable the Trust for Public Land to acquire leased parcels in this area from Plains Exploration and Production to prevent oil and gas development. Nearly all of the roughly 60,000 acres of leases purchased in the sale were on national forest land, and because of the Wyoming Range Legacy Act, the now-retired oil and gas leases cannot be leased again. The 5,210 private surface (federal mineral) acres that lie adjacent to the national forest, however, don't have that same protection—and thus, the BLM's action today is essential.

Unfortunately, the BLM's draft EA contemplates oil and gas leasing on these split-estate lands, albeit with no surface occupancy stipulations. This is not the outcome we and our partners—the 1,100 individual citizens who donated toward the lease buy-out—envisioned. And it is not an option we support today.

Our reasonable expectation was that the entirety of PXP's leases would be unavailable to future oil and gas leasing. This is the decision that will best ensure consistent management with lands immediately adjacent to the 1.2 million acres that the Wyoming Range Legacy Act withdrew. It will protect the investment citizens made when they contributed to the purchase of PXP's oil and gas leases for retirement, and it will also honor the intentions of the state and other private entities that invested in conservation easements on these split-estate parcels due to their high-quality wildlife habitat values.

The NSO alternative falls short of meeting these expectations. This area is one where the public has spoken in no uncertain terms. The highest and best uses of this landscape—including these split estate lands largely held under conservation easement—are for wildlife and undeveloped, open space. Please select the no leasing alternative as the BLM's final decision.

Thank you for your consideration.

Sincerely,

A handwritten signature in black ink that reads "Lisa D. McGee". The signature is written in a cursive, slightly slanted style.

Lisa D. McGee
Wyoming Outdoor Council
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