UT September 2020 Oil and Gas Lease Sale

Introduction

The Bureau of Land Management (BLM) recently released a proposal to lease 114,050 acres of public land across the state of Utah for oil and gas development, most of which is located near Moab in Grand County between Canyonlands and Arches National Parks.[1] The proposed leases directly conflict with high value recreation areas, proposed sensitive wildlife protection zones, and are located within only a few miles of three national parks, a state park, and the original boundary of Bears Ears National Monument. One lease is within 1/10 of a mile of the Green River near where a massive oil spill occurred only a few years ago.

The sheer size of this proposed lease—in an oil field with a significant number of existing federal and state leases—rivals only the notorious "77 Leases" from 2008 that was so controversial that it prompted lawsuits, a cancellation of the leases, and significant oil reforms designed to incorporate more stakeholder input and balance multiple uses on public lands. Those reforms were jettisoned a few years ago by the current administration, and now the BLM is going forward with this massive proposal widely opposed by citizens groups, recreation organizations, the businesses community, and local government.

Industrial Impacts Inconsistent with Outdoor Recreation

Technically, under current law these proposed leases are legal. However, the 2015 Moab Master Leasing Plan, which governs oil and gas leasing and production in this region, did not contemplate the massive scope of new leases now being offered all at once, especially given the extensive existing oil and gas leases in the region. If the price of oil rebounds, we can expect what were once popular high-quality recreation areas to compete with booming industrial truck traffic, expanded roads systems, marginalized air and water quality, and new safety concerns—all which will transform Moab's outdoor recreation brand into an industrial hot spot. Think Vernal, Utah but with tons of multiple use conflicts with those visiting the national and state parks, as well as the popular high-quality BLM recreation lands in the area.

The BLM acknowledges there is likely to be impacts: during well development, there could be emissions from earth-moving equipment, vehicle traffic, drilling, and completion activities. Air pollutants would be emitted from vehicle tailpipes. Fugitive dust concentrations would increase with additional vehicle traffic on unpaved roads and from wind erosion in areas of soil disturbance. Drill rig and fracturing engine operations would result in polluting emissions. These temporary emissions would be short-term during the drilling and completion phases, but during well production there would be continuous emissions from separators, condensate storage tanks, and daily tailpipe and fugitive dust emissions from operations traffic. During the operational phase of a well, a range of emissions would result from the long-term use of storage tanks, pumps, separators, and other

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[1] This interactive map from the Outdoor Alliance shows how this proposal conflicts extensively with the abundance of popular and economically productive recreation in the Moab area. Make sure to select both the oil/gas and recreation layers to see all the data and deselect layers to focus on the most relevant data.

equipment. Additionally, road dust would be produced by vehicles servicing the wells. All this in a region very active with mountain bikers, rock climbers, equestrians, OHV enthusiasts, trail runners, hikers, auto-tourists, canyoneers and many other outdoor enthusiasts seeking a quality experience in the natural environment.

BLM Failed to Consider Oil & Gas Impacts on Outdoor Recreation

Yet, in this proposal BLM's required socioeconomic analysis only considers the marginal benefits *to* the community *from* oil and gas developments—which are few—such as royalty payments to counties (which ironically, the administration has deferred during the COVID pandemic), and temporary jobs for local contractors to build roads, clear drill pads, and construct associated support facilities. Local restaurants and hotels may also see a short-term uptick in business from the few dozen but mostly temporary oil workers. But this economic activity is miniscule compared to that which is generated by the outdoor recreation economy, especially now that royalty payments to counties are deferred. Yet in charging forward with this lease sale the BLM provides no meaningful cumulative impact analysis of how these leases will impact the outdoor recreation economy.

The Moab MLP also did not foresee potential for this broad and simultaneous scope of development, and in any case there have been significant changed circumstances since that plan was completed such as evolving recreation use patterns and new and significant wildlife protection areas. The BLM's own policies—when developing the Moab Master Leasing Plan—required parcel specific environmental analysis, something the BLM has failed to do in this proposal. While the BLM does provide mitigating "stipulations" and "lease notices" in the proposal such as "no surface occupancy" and "controlled surface use" restrictions, these mitigating measures fail to prevent the long- term marginalization of air and water quality, and visual impairments to the landscape.

But perhaps most significant is that even though site specific parcels may have a no surface occupancy limitation, the oil and gas produced from these wells that was directionally drilled from an adjacent parcel (which themselves cause air/water/noise/visual impacts) all must still be transported to market via 1)new pipelines with respect to gas (if the pipelines are even operating, if not this gas will likely be flared or simply released into the atmosphere), or 2) via truck in the case of oil. Regarding the extensive proposed leases in this sale located in and around the popular recreation areas just north of Canyonlands National Park, **all of that oil would have to be trucked out Highway 313**, one of the busiest and important highways in Grand County that services many BLM recreation areas as well as Canyonlands National Park and Dead Horse Point State Park. The volume of industrial traffic that would occur out on this road if the price of oil rebounds is simply inconsistent with Moab's world-class outdoor recreation economy. These considerations were ignored in the BLM's proposal.

The BLM should cancel this unprecedented lease sale to prevent damage to Moab's world-class outdoor recreation brand that supports an economic sector far more valuable than the oil and gas industry. This action would recognize that economic trends show recreation offers more sustained yield than the oil and gas industry regarding economic production and landscape conservation. Cancelling the auction would also acknowledge the overwhelming position of the business community, local government, outdoor recreation groups and other public stakeholders that massive oil and gas leasing in the region does a disservice to the future of Moab and Grand County.