

The Anvil Points Bulletin

Vol 2 Issue 2

Winter 2004

Roan Plateau draft plan out for comment—communities rally to protect a Colorado Treasure

A middle-ground solution will allow most of the gas to be developed and still protect the Roan Plateau's top and cliffs.

RIFLE— The Bureau of Land Management has begun taking comment on a draft plan for Colorado's Roan Plateau that the agency released in November. The Roan Plateau rises 3,500 feet above the Colorado River valley as an undeveloped island of public land amid a quickly growing complex of oil and gas fields. Public comments must be received by March 4, 2005 (see inside).

The long-delayed plan has been a priority of the Bush Administration, which hopes to open up the area's minerals to energy corporations. In addition to energy development, the plan will manage off-road vehicle use, backcountry recreation, and habitat protection, as well as other uses.

Several people have praised the BLM's efforts to involve local communities as they prepared the draft, although they note that none of the alternatives offer the protection favored by most who have commented to date.

Instead, many maintain that there is a better plan for the Roan Plateau, a plan that allows most of the natural gas to be developed and still protects the top and cliffs. This middle-ground solution for the Roan Plateau would:

- Honor the community-supported position to protect the top and cliffs, and still get most of the natural gas to be developed under the plan.
- Protect backcountry recreation opportunities and promote recreation in the Hubbard Mesa Special Recreation Management Area.
- Keep the Roan Plateau mostly "as it is," while still managing the area for responsible energy development and other public land uses.



A Better Plan for the Roan Plateau

- Sets high standards and encourages innovation through limiting drilling to the base and requiring newly developing technologies that keep drilling off the cliffs and the top of the Roan Plateau.
- Retrieves up to 86% of the natural gas to be developed during the next 20 years.
- Protects important natural and roadless lands.
- Allows responsible energy development on over 2/3 of the Planning Area.
- Protects backcountry recreation, scenic landscapes, wildlife habitat and sensitive species, like the Colorado River cutthroat trout.
- Promotes developed recreation opportunities.
- Respects local communities and residents' quality-of-life through 'best management practices' for drilling and energy development.

Speak Out! The BLM is listening: now is the time citizens can make the biggest difference!

Please Comment by March 4, 2005

You can submit written comments online at
www.roanplateau.ene.com

Or mail /fax to: ROAN PLATEAU COMMENTS

Bureau of Land Management Glenwood Springs Field Office
Attn: Greg Goodenow
PO Box 1009 /Glenwood Springs, CO 81602
Fax 970-947-2829

Although none of the alternatives in the draft plan offer adequate protections for the important public resources at stake, elements from within several of the alternatives properly strengthened would combine to implement this better, middle-ground solution for the Roan Plateau.

POINTS TO MAKE IN YOUR COMMENTS

Instead of selecting any of the alternatives as written, the BLM should revise and then select as its final plan, one which honors the community-supported middle-ground solution to protect the Roan Plateau's top and cliffs.

The BLM should select a better plan, which:

1. Prohibits leasing on the Roan Plateau's top and cliffs or defers leasing on the top and cliffs until development can be achieved through technologies that will not require surface disturbance;
2. Provides adequate, non-changeable protections for important habitat, backcountry and roadless areas, recreation emphasis areas, and other sensitive resources in the Planning Area;
3. Ensures that development respects local communities, employs "best management practices," and minimizes damage;
4. Keeps motorized/mechanized use on marked and designated roads and trails only and maintains certain areas for such use; and,
5. Prioritizes natural resource protection.



Alternative III**A LOOK AT THE "PREFERRED ALTERNATIVE"**

(Page numbers refer to the draft Resource Management Plan and draft environmental impact statement for the Roan Plateau Planning Area).

[Deferred drilling] is not a protective measure *per se* because all of the lands would become available for oil and gas development at some point, probably during the 20-year period of analysis. (4-3)

[Oil] and gas development would basically occur over the entire area... (4-192)

Impacts to Wildlife

Thus, benefits [to wildlife] of deferring development on top of the plateau would be offset by the greater development intensity once it begins and the much greater area ultimately available for development. (4-84)

[It] is reasonable to conclude that Alternative III could cause the BLM portion of the Planning Area to suffer an approximate decline of 33 percent in deer... (4-87)

Impacts to Local Quality-of-Life

[The] introduction of industrial features in the landscape of the newly developed areas would be extensive and would bring about a transformation of the visual character that residents value so highly. (4-173)

Impacts to Hunting and Recreation

Hunting and other forms of dispersed recreation within the planning unit could eventually be affected by the substantial drilling activity atop the Roan Plateau. (4-173)

Additionally, the BLM and [Colorado Division of Wildlife] could decide that the area atop the plateau should be closed to hunting in areas of active development following the deferral period. (4-85)

No contribution would be made toward meeting increasing demand for outstanding opportunities for solitude or primitive and unconfined types of recreation. (4-224)

A closer look at Alternative III

The BLM's "preferred alternative" (Alternative III) would defer drilling on top of the Plateau. But what does this really mean?

Alternative III of the Roan Plateau Resource Management Plan and Draft Environmental Impact Statement (DEIS), the designated "Preferred Alternative," is one of three of the five alternatives presented that open the entire Planning Area to oil and gas leasing.

However, unlike the other two "lease-it-all" alternatives, Alternative III defers leasing the top until "80% of anticipated wells below the rim have been drilled" (Roan Plateau Planning Area Resource Management Plan and DEIS 4-126).

This 'deferred leasing' provision is a unique feature of the draft plan and has received a lot of attention. Unfortunately for the Roan Plateau, however, this device fails to offer meaningful protection. In fact, none of the alternatives offers the level of protection that these lands warrant and that a near-unanimous collection of voices has demanded: that drilling be kept off the cliffs and top of the Plateau.

The 16-year estimated deferral period does not reflect current trends. At today's rates, "deferred" drilling could start on top of the Plateau in eight years or less.

Once the top is leased and drilling starts on top, a range of resources is likely to be irreparably harmed. Under the "Preferred Alternative" (Alt. III) one-third of the deer herd could be destroyed (4-87) and large sections could be closed to hunting (4-84). In fact, backcountry opportunities are likely to be almost completely eliminated (A-Map 39-42). Visual resources will take a similar hit (A-Maps 24-27). Overall, the area would "change to a more industrial appearance" (4-150), which could, "induce many residents to conclude that their quality of life is being adversely affected" (4-173).

See "A closer look..." page A4

FROM PAGE A3-
A closer look...

Historically, the BLM's projections have been "consistently low," as the current development projections note (H-4). This time appears to be no exception. For example, drilling rates are based on industry estimates from 2001 that estimated that "[Williams Companies] will drill approximately 100 private and Federal wells per year in the region (DEIS H5)." In 2004, however, and for at least the next few years, that number had increased to nearly 300 wells (*Glenwood Springs Post-Independent* 11/19/04).

To base analysis on low-ball projections hides the environmental costs of drilling on top of the Plateau and of the "Preferred Alternative."

Once drilling begins, hundreds of wells will follow, essentially eliminating the Roan Plateau's backcountry recreation and wilderness-quality lands. Even with its "deferred" drilling provision, over one hundred wells would likely be drilled on top of the Roan Plateau under this plan; with hundreds more following as the leases are moved into full-field development.

Community leaders and citizens remain unconvinced by the plan's draft alternatives. Instead many are standing behind a better plan for the Roan Plateau. This middle-ground solution would honor the consensus already adopted by over ten thousand citizens, local businesses and governments across Garfield County, to keep drilling off the cliffs and public lands atop the Plateau.

With faith in the democratic process and a united effort, citizens can make the difference during this critical comment period. Together we can convince our elected representatives and public officials to stand behind this better plan for the Roan Plateau.

For more information:

Clare Bastable 970-618-1341
 Pete Kolbenschlag 970-527-7502
 Alan Rolston 970-285-2250

www.SaveRoanPlateau.org

AT A GLANCE

Q: Based on current rates, when is drilling on top of the Roan Plateau likely to start under "deferred leasing" (Alternative III) in the draft Roan Plateau plan?

A: In about 8 years, half the 16 years projected under Alt. III.

1,651 wells [remaining to be drilled to reach 80% threshold]. This is the point at which the public lands atop the Roan Plateau would be opened for drilling, according to the draft plan (DEIS 4-126). This number can change based on new information and circumstances (DEIS 4-216).

$$2,342 - 691 = 1,651$$

[BLM's number of wells drilled to meet the 80% threshold (DEIS 4-216)] minus [Current wells inside Planning Area (Pers. Conversation w/ BLM/Steve Bennett)]

/248 wells per year [as "weighted annual average" drilled at base]. Calculations according to formula in "Notes" Reasonable Foreseeable Development Table (DEIS H-14)

$$\frac{(16,476 * 300 + 18,066 * 200)^1}{(16,476 + 18,066)} = \frac{8,556,000}{34,542} = 248$$

[(Lands which remain to be leased at base (DEIS H-14)]*[annual EnCana wells]¹ + [lands at based leased by Williams (DEIS H-14)]*[annual Williams wells]¹] / [(lands which remain to be leased at base] + [lands at based leased by Williams])

=6.66 Years [until drilling at base meets 80% threshold]

$$\frac{1,651}{248} = 6.657258064$$

The BLM calculates that drilling will start "up to a year" after the lands atop the Roan Plateau are available for leasing (DEIS 4-216). Thus under the "deferred leasing" of Alt. III, drilling on top would start in about eight years, based on current rates, using the BLM's numbers and formulas.

[Wells remaining to be drilled to reach 80% threshold] / ["weighted annual average"]

EXPLANATION

Text depicts formulas and indicates sources. Numbers and formulas are taken directly from the Roan Plateau Planning Area (RPPA) Resource Management Plan and Draft Environmental Impact Statement (DEIS), variously at section 4.5.5.3 (DEIS 4-215, 216) and in Appendix H ("Oil and Gas Reasonable Foreseeable Development for the Roan Plateau Planning Area" (DEIS H-1) and Table H-2 "Reasonable Foreseeable Development" (DEIS H-14)), unless noted: Current well numbers inside the RPPA (691) are from a December 2, 2004 personal conversation w/ Steve Bennett, Glenwood Springs BLM. The projections for estimated annual Williams and EnCana wells are based on recent reports. See "Today's Economy: A Colorado Viewpoint." *The Adam's Group*, 10/22/04 (at www.coloradoeconomy.com/nl102204.html); and, "Natural gas company plans 800 new wells," *Glenwood Springs Post-Independent*, 11/19/04 (at www.postindependent.com/article/20041119/VALLEYNEWS/11190019).