

## ***BLM's Roan Plateau plan threatens popular Colorado treasure***

*Proposed action would favor drilling, shut out public and traditional uses*

In September, the Bureau of Land Management released its proposed management plan for the Roan Plateau, along with its final Environmental Impact Statement (FEIS) for that action. A 30-day protest period on the proposed plan ends October 16, 2006. The proposed plan's unveiling received some fanfare, but the Executive Summary and media materials accompanying this release did not describe in detail what exactly BLM's proposal meant for Roan Plateau. Upon closer review, unfortunately, it becomes quite clear that BLM's proposed plan does not offer the community-supported management long sought by local governments and thousands of citizens for these lands, instead emphasizing oil and gas development over Roan Plateau's other public and traditional uses.

### ***BLM's proposed plan does not include protections local communities have supported all along.***

BLM's proposed plan does exactly what communities have urged against – it opens the top and cliffs of the Plateau for oil and gas drilling. Since the planning process started in 2001, citizens and local communities have been asking the BLM to leave Roan Plateau “as it is” and to protect these public lands for traditional uses, such as hunting, fishing, ranching, and camping. During the five-year planning process, local governments have passed 3 separate resolutions urging that Roan Plateau's top and cliffs be protected from drilling, and that responsible development be implemented in areas already leased for oil and gas.<sup>1</sup>

### ***Drilling in Garfield County is occurring at a record pace, making it all the more important to protect places like the Roan Plateau.***

- Garfield County is approving drilling permits faster than any other Colorado county, and is on pace to reach over 1,500 permits this year.<sup>2</sup>
- Over 15,000 new wells are likely to be drilled in Garfield County over the next decade.<sup>3</sup>
- Approximately 85 percent of BLM lands in the White River area, just north of the Roan Plateau have already been leased for natural gas, and more than 13,000 wells are expected to be drilled on these lands over the next 15 years.<sup>4</sup>

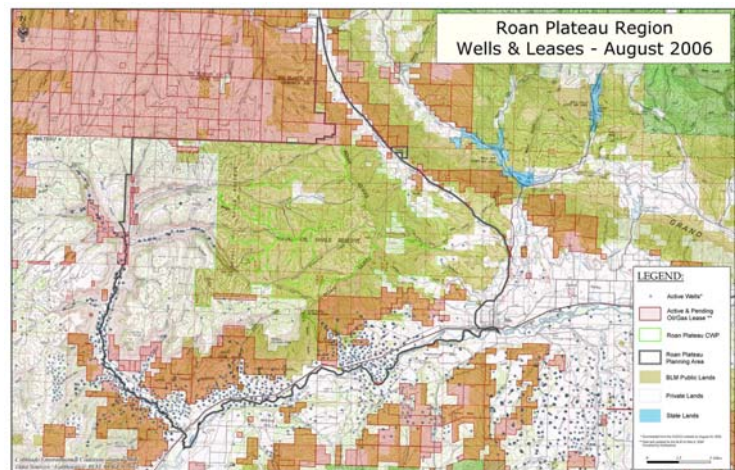
### ***The proposed plan emphasizes oil and gas development over the Roan Plateau's other values and traditional uses.***

**Recreation**-According to the FEIS, “Although public comments on the Draft EIS indicated a demand for undeveloped recreation settings, the BLM has concluded “management to accommodate substantial oil and gas development precludes maintaining characteristics specific to undeveloped recreation settings.”

-Instead, the final plan would manage the Roan as an “extensive recreation management area,” which requires recreational activities to adjust to natural gas development.<sup>5</sup>

**Wildlife Habitat**-According to the FEIS, “outfitters and the big game they hunt will be...displaced;” and, “Some areas of high-quality wildlife habitat would be lost or permanently altered.” The FEIS notes, “Some of these impacts could never be reversed, especially those that eliminate genetically unique resources...such as genetically pure Colorado River cutthroat trout.” The FEIS also mentions closing the area to hunting if ‘crowding’ becomes a problem.<sup>6</sup>

**Wilderness Quality Lands**-In 1998-2000, BLM performed a wilderness inventory on the Roan Plateau, and found three separate areas that met the qualifications for wilderness. The FEIS states that the plan's emphasis on oil and gas development “would effectively eliminate wilderness character in the three inventory units as a whole,” going on to note that “opportunities for primitive and unconfined types of recreation, naturalness, and solitude would not be preserved under the Proposed Plan.”<sup>7</sup>



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***The devil is certainly in the details ...***

The BLM has come up with some innovative ideas for energy development in the Roan Plateau Planning Area. However, a closer look at the plan reveals that protections touted at the plan's release, might not be applied on the ground. Some of the claims made about the proposed plan weaken considerably in light of details included in the 'fine print' provided in the final Environmental Impact Statement. The result is that BLM's proposed plan provides insufficient protection for Roan Plateau's unique natural resources and popular public uses. The industrial affects of oil and gas development would eventually spread across the landscape, impacting all other uses and values. According to the FEIS:

***Claim: Under the BLM's proposal, 'No Surface Occupancy' stipulations "cover 51 percent of the Planning Area."***

***-Reality:*** Although this stipulation seems to prohibit surface disturbing activities in sensitive areas, the details explain otherwise. Table C-1 (FEIS at C-3) spells out exactly how stipulations can be waived or modified. In many cases, these stipulations may not be required at all under the proposed plan.<sup>8</sup>

***Claim: The proposed plan would result in "approximately 210 wells on 13 pads above the rim and 1,360 wells on 180 pads below the rim."***

***-Reality:*** According to a BLM spokesman, "the Plan doesn't limit the number of wells and the number of well pads" and "there is no number that says only 210 wells on top." Indeed, many more wells are likely under the proposed plan. BLM bases the projected number of pads and wells on assumptions that even the oil and gas industry calls "unrealistic", and which "grossly" misrepresent the amount of drilling and impacts likely atop the Plateau.<sup>9</sup>



Under the proposed plan, Roan Plateau's public lands will become an industrial zone like it's private lands shown here, that are currently being developed for their natural gas reserves.  
PHOTO: Dana Barker/EcoFlight

***Claim: The proposed plan would "Limit the amount of disturbed land at any one time to 350 acres, representing approximately 1 percent of the BLM lands on top of the plateau."***

***-Reality:*** The proposed plan does not require that disturbed areas be fully reclaimed before new roads are bladed or wells drilled. It only requires that the reclamation process be showing "satisfactory progress" toward meeting short-term goals. Once in the process of reclamation (which, according to the Plan, can take 20 years or longer to be successful), developed lands will no longer be counted against the 350-acre total and new roads can be built and additional lands drilled.<sup>10</sup>

***Claim: The proposal would "Restrict drilling operations to only one of six 'phased development areas' at a time"***

***-Reality:*** While "active drilling" can only be occurring on one ridgetop at a time, an unspecified number of exploratory wells can be drilled in any of the six ridgetop 'phased development areas' at any time.<sup>11</sup>

<sup>1</sup> 74,902 comments were submitted on the draft; 73,788 of these supported protection of Roan Plateau and opposed drilling the public lands on top (FEIS) at 6-6 through 6-10). See, Town of Silt Resolution 38-2006, City of Rifle comments on the draft, and earlier resolutions, available at [www.saveroanplateau.org/background.htm](http://www.saveroanplateau.org/background.htm).

<sup>2</sup> *Rocky Mountain News*, August 18, 2006: "Record energy pace" at [www.rockymountainnews.com/drmn/energy/article/0,2777,DRMN\\_23914\\_4925758,00.html](http://www.rockymountainnews.com/drmn/energy/article/0,2777,DRMN_23914_4925758,00.html).

<sup>3</sup> Well projections are based on conversation with Garfield County oil and gas liaison, July 2006. Also, note number of 2006 permits projected for Garfield and extrapolate.

<sup>4</sup> From BLM email, 9/19/06: "According to the White River Field Office, they have a total of 1,454,713 acres of BLM surface. ... There are 1,155,410 acres of BLM surface where the underlying oil and gas is currently leased, or 84.22% of the area..." U.S. Federal Register June 14, 2006: "Notice of Intent To Prepare an Amendment to the White River Field Office Resource Management Plan and Associated Environmental Impact Statement for Oil and Gas Development."

<sup>5</sup> FEIS at 2-14, 2-62, 4-111.

<sup>6</sup> For discussion on wildlife impacts see FEIS at 4-44, 4-130; FEIS mentions closing the area to hunting if 'crowding' becomes a problem at 4-113.

<sup>7</sup> BLM acknowledges that the Planning Area includes "three areas (totaling 21,382 acres) found by BLM to contain wilderness characteristics," the results of a 1998-2000 BLM inventory (at 1-8), but notes elsewhere that no "areas [will] be managed specifically to protect and preserve wilderness values" (at S-4); see also FEIS at 4-128.

<sup>8</sup> News articles have generally reported these NSO stipulations as somewhat absolute, as in this September 8, 2006 *Aspen Daily News* article "Drilling would be barred from more than half the planning area to protect wildlife, trout, water quality and the views from below." The claim in the FEIS itself (at S-3) is more ambiguous. Meanwhile, the actual details in the FEIS (at 4-8, B-2, Table C-1 at C-3) provide a substantially different picture.

<sup>9</sup> The FEIS uses various drilling assumptions to reach a projected number of pads and wells within the Planning Area (explained briefly at 4-66, in the Appendix at H-15, and in Table H-1 at H-28, 29). However, these numbers are somewhat arbitrary, as BLM admits. For instance, see the September 16, 2006 *Grand Junction Daily Sentinel*, "Feds: Users of Roan will have to adapt." Comments from the Independent Petroleum Assoc. of the Mountain States and Public Lands Advocacy (FEIS at 6-69, 6-70) note that year round drilling atop the Plateau is "easily achievable."

<sup>10</sup> Limited Surface Disturbance is described as a 'basic component' of the proposed plan at S-3. Details are provided at FEIS at 4-18 and 4-44.

<sup>11</sup> Phased Development is described as a 'basic component' of the proposed plan at S-3. Details are provided at FEIS 2-8, 9.

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