

## A Middle Ground Solution for Energy Development at Roan Plateau

The following steps to a reasonable final plan for the Roan Plateau Planning Area, crafted by thoughtful citizens, energy experts, and local communities, provide the unique opportunity to contribute significantly to the nation's energy supply while protecting the best natural features of this popular area.

**[Secretary of Interior Gale] Norton said the government's role in protecting the environment should rely less on strict regulation than on setting high standards and encouraging innovation in meeting them.** *Casper Star Tribune*, November 27, 2004

By reconfiguring elements from within several of the draft alternatives as

outlined below, and adopting this as its final plan, the BLM would abide by its pledge to truly create a “community-supported” management plan for the Roan Plateau.

### HONOR Communities' Vision for Roan Plateau

#### 1. Keep drilling off the top; produce large volumes of gas from the base

The final plan for the Roan Plateau Planning Area should comply with what every local municipality has asked: that drilling be kept off the public lands atop Roan Plateau. **Specifically, the BLM should defer all leasing on top during the life of the management plan or unless and until gas resources can be extracted from under the Plateau without disturbing the surface.**

*This change builds on the unique idea of “deferring leasing” of some lands, contemplated in the draft management plan (in Alternative III), and strengthens it to honor what the public has supported, that the public lands on top of the Plateau be managed for public uses other than oil and gas drilling.*

*With rapidly expanding technologies, it is reasonable to assume that during the life of the twenty year plan, the majority, if not all, of the “recoverable” natural gas under Roan Plateau itself will be accessible through directional drilling and other improved technologies. This revision also works toward the Interior Secretary's stated goal “to encourage innovation” by creating an incentive for entrepreneurs to advance technologies.*

Well managed gas development, based on ever-improving technologies, should continue at the base of the Plateau. **The BLM should concentrate oil and gas development in that production area, taking advantage of existing roads and infrastructure and better access to the gas fields for continued large-volume gas production.**

*Analysis of figures in the draft plan shows that this approach will allow development of between 85% and 99% of the federal natural gas likely to be produced from the Planning Area over the next twenty years.*

*This approach also allows time for drilling technologies to advance before developing additional gas that may lie beneath the top and cliffs. Allowing even a small amount of gas leasing on top of the Plateau under this management plan would permanently commit the top to becoming an ever growing industrial area of hundreds or thousands of gas wells. Contemplation of such an irretrievable decision should be postponed until future management plans are developed and after technologies have improved.*

## PROTECT Roan Plateau's natural and recreation values

### 2. Strong protections for natural resources and public use

The BLM should strengthen stipulations to safeguard Roan Plateau's ecological values, and to protect the area's impressive and popular backcountry and primitive recreation opportunities. **The final plan should expand the permanent protective stipulations contemplated in the draft management plan (in Alternative II)—including the provision that no ground disturbing activities be allowed on certain lands** to provide the strongest protections important natural resources, sensitive habitats, and backcountry opportunities on the Plateau's top and cliffs.

**The final plan should include Watershed Management Areas (from Alternative III)** for many purposes, including protection against damage from oil and gas and other development.

## PROMOTE Recreation opportunities

### 3. Agency commitment to maintain Roan Plateau's public lands for recreational use

The final plan should designate two Special Recreation Management Areas (SRMA), one above and one below the rim, offering both backcountry and developed recreation opportunities. **Specifically, the BLM should protect the Hubbard Mesa SRMA with No-Surface-Occupancy stipulations for any oil and gas development that may occur there**, and should immediately develop a community-supported implementation plan and prioritize funding for appropriate signage and facilities.

**The BLM should add back into the plan, a 32,639 acre Special Recreation Management Area atop the Plateau** to protect the Plateau's backcountry opportunities, including hunting, outfitting, backpacking, hiking and horseback riding. (This SRMA was presented in a popularly-supported preliminary alternative, supported by local governments, but is not included in any of the BLM's current draft alternatives). **Travel management prescriptions (from Alternative II) that limit motorized and mechanized travel to designated routes should be included in the final plan.**

## RESPECT Communities' and residents' quality-of-life during energy development

### 4. Use of Best Management Practices and emphasis on resource protection

The BLM should require that industry always use Best Management Practices and technologies in future development on any of the area's public lands. **The final plan should emphasize protection for the area's important natural resources (examples in Alternative II and as noted above).**

*In the two-thirds of the Planning Area where natural gas drilling and development will continue under the balanced plan proposed here, the BLM should set high standards and require that industry do it right.*

*As a public agency, the BLM should emphasize protection of the area's other public and natural resources. In addition to their ecological importance, the public lands of the Roan Plateau area are an important community resource, and many of these lands border residential areas. The BLM should ensure that oil and gas development on the public domain respect the public that actually use, live beside, and share these lands.*

**Thank you for considering this reasoned, middle ground solution for managing all the important natural and public resources found at Roan Plateau.**

**Please join in supporting the Community Alternative. Together we can win a better plan for Roan Plateau.**