

Colorado Environmental Coalition
The Wilderness Society
Colorado Mountain Club
Sierra Club
Center for Native Ecosystems
Wilderness Workshop

June 2, 2005

Jamie Connell, Manager
Bureau of Land Management Glenwood Springs Field Office
PO Box 1009
Glenwood Springs, CO 81602

Submitted electronically to Jamie.Connell@co.blm.gov
Signed original via surface mail

Dear Ms. Connell:

On April 11, 2005 in our comments on the draft Resource Management Plan Amendment (RMPA) for Roan Plateau, our organizations submitted a request under the Data Quality Act (DQA) to the Glenwood Springs Field Office of the Bureau of Land Management (BLM) asking that the agency correct and provide a reasonable, realistic, and accurate account of drilling rates and related development inside the Roan Plateau Planning Area by presenting the public with an updated Reasonable Foreseeable Development (RFD) analysis for consideration and comment.

As discussed in further detail in our comments, the RFD used by BLM as the basis for assessing likely impacts of oil and gas development significantly underestimates the likely scope and scale of development, relying on outdated information regarding available equipment and ignoring readily accessible information about the development already approved and/or planned by Williams Production and Encana, as well as by other operators moving into the region. This letter serves as a friendly reminder of your obligations to provide a response to our request by June 10, 2005.

This request for correction of information was included in our comments on the draft, as required by agency guidance on the DQA (*Bureau of Land Management Information Quality Guidelines* hereafter "Guidelines"). Our comments noted that:

In these comments, we are also specifically requesting a correction of information as per the Data Quality Act (DQA).

Furthermore, as required by the Guidelines, our comments specified each of the following:

An indication that the person is seeking correction of information disseminated by BLM... Name and contact information... A description of the information the person believes does not comply... An explanation of how the information does not comply...

Finally, as encouraged by the Guidelines, our comments proposed the following corrective action:

We therefore request a correction of the [Reasonable Foreseeable Development analysis], and ask that the BLM present a new one to the public for review and comment, and that the agency use this corrected RFD to fully and fairly disclose and discuss likely impacts to the resources of the Planning Area over the twenty-year expected life of the plan. The BLM should also include a fair and full discussion of related connected actions that are likely to drive additional development throughout the region.

Therefore, under the DQA and Guidelines, we respectfully request that your office provide a written response NO LATER THAN JUNE 10, 2005 to our request. The Guidelines states, in relevant part (emphasis added):

BLM will review every request for correction under these guidelines and consider it for correction unless the request itself is deemed “frivolous...”

Since our request was made in a timely manner within the public comment period provided on the draft RMPA, pursuant to all the requirements of the DQA and agency guidelines, the agency must consider this request and is obligated to provide a written explanation no later than June 10. The Guidelines continue (emphasis added):

...Whether a request is approved or not, BLM will send an explanation to the requester **no later than 60 calendar days after the request is filed.**

Please feel free to give me a call at 970-527-7502 if I may provide further details, or if you would like another copy of our comments and DQA request for a correction of information.

Sincerely,

Pete Kolbenschlag, Western Slope Field Director
Colorado Environmental Coalition

Cc: Ron Wenker, BLM Colorado State Director
Honorable John Salazar, U.S. House of Representatives
Nada Culver, attorney, The Wilderness Society
Bob Randall, attorney, Western Resource Advocates