



Utah Rock Art Research Association

P.O. Box 511324 Salt Lake City, UT 84151-1324

www.utahrockart.org

November 14, 2016

Bureau of Land Management
Attention: Sheri Wysong
440 West 200 South Suite 500
Salt Lake City, Utah 84101-1345

Protest of December 2016 Oil and Gas Lease Sale. Project # UT-G010-2016-033-EA.

Dear Sheri Wysong:

The Utah Rock Art Research Association (URARA) is the largest organization dedicated to Utah rock art. Our mission is:

- To lead in the preservation and understanding of the value of rock art
 - To encourage the appreciation and enjoyment of rock art sites
 - To assist in the study, presentation, and publication of rock art research
- Our members have professional, academic, and avocational interest in Utah rock art.

URARA has a long history of working with the BLM in Nine Mile Canyon. We have:

- Documented rock art in the area
- Participated and cooperated with the field office with site steward programs
- Participated in the development of the West Tavaputs Programmatic Agreement and subsequent associated activities
- Assisted with other projects to preserve cultural resources
- We commented, as a consulting party, on the Environmental Assessment for the November 2016 Vernal Lease Sale
- We participated in a meeting with Jenna Whitlock, Kent Hoffman, and the Nine Mile Canyon Coalition on September 27, 2016 to express concerns about the inclusion of these two lease parcels in the lease sale.

URARA protests the inclusion of lease parcels 009 and 010 in the December 2016 Vernal Lease Sale.

We believe that, with the best of intentions, the BLM has made a serious mistake in including these two leases in the sale. The BLM recognizes the cultural sensitivity of the two lease parcels and has required a No Surface Occupancy (NSO) stipulation for their development. The NSO designation protects the leases themselves, but ignores the issue of how access, drilling, and gathering might occur. The BLM must consider these indirect impacts associated with potential development of these leases. As we review the area maps we don't feel it is possible to drill from the north side of the leases due to the rugged topography. Drilling on the south side of the leases requires drilling to occur

either in the canyon bottom or on the southern plateau. The southern plateau will require unattractive long distance directional drilling and long transportation routes to access drilling facilities. To the east there is a parcel of SITLA land where drilling might occur. Drilling from the west could occur from the canyon bottom.

In our opinion, it is reasonably foreseeable that drilling for these leases will occur on private land in the canyon bottom of Nine Mile Canyon. It is the easiest and cheapest alternative available to a company interested in developing the leases. In our September 27 meeting with Jenna Whitlock and Kent Hoffman we asked if the BLM was able to guaranty that development would not occur in the canyon bottom and were told that this was not possible.

This presents several concerns which seem to violate the BLM's determination of finding of no significant impact associated with these leases.

1. The Nine Mile Canyon road is a designated Backcountry Byway. We believe that the inclusion of drilling and gathering facilities within the narrow canyon will impair the value of that designation.
2. URARA is actively participating in the development of a Special Recreational Management Plan for the Nine Mile Canyon area in conjunction with the West Tavaputs Programmatic Agreement. We believe that the inclusion of these two leases in advance of the SRMA development is inappropriate. This SRMA was specifically designated "to protect high-value cultural values and scenic quality."¹ Both cultural values and scenic quality will be impaired by lease development in the canyon bottom. Nine Mile Canyon is a special area with an extraordinary concentration of cultural sites. It is also well known by the public and easy for them to access. Our conversations with employees of the Carbon County Tourism Office indicate that Nine Mile Canyon is the most requested area in the county for tourism information and that there has been a great increase in visitation since the road has been paved.
3. The BLM is responsible to protect sites eligible for inclusion in the National Register of Historic Places. The EA does not assess how drilling in the canyon bottom or SITLA parcel to the east will impact National Register eligible sites in these areas.

We believe that leases 009 and 010 should be deferred until these issues have been resolved.

Troy Scotter
Conservation and Preservation Committee, URARA

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http://www.blm.gov/style/medialib/blm/ut/vernal_fo/planning/rod_approved_rmp.Par.12251.File.dat/VernalFInalPlan.pdf page 35