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WESTERN ENVIRONMENTAL LAW CENTER

April 20, 2026

U.S. Bureau of Land Management
New Mexico State Office
Attn: State Director
301 Dinosaur Trail
Santa Fe, NM 87508

U.S. Bureau of Land Management
Pecos District Office
Attn: Catherine Brewster
2909 West Second Street
Roswell, NM 88201-2019

U.S. Bureau of Land Management
Farmington Field Office
Attn: ajennings@blm.gov
6251 College Blvd. A
Farmington, NM 87402

U.S. Bureau of Land Management
Wyoming State Office
5353 Yellowstone Rd
Cheyenne, WY 82009

Via Eplanning

Re: Protest of the Final EA, ROD, and FONSI for the New Mexico and Wyoming Q2 2026 Oil and Gas Lease Parcel Sales (DOI-BLM-NM-F010-2026-0001-EA, DOI-BLM-NM-P000-2026-0001-EA, DOI-BLM-WY-0000-2026-0001-EA)

The Western Environmental Law Center, along with along with Center for Biological Diversity, Chaco Alliance, Citizens Caring for the Future, Coalition to Protect America's National Parks, Living Rivers and Colorado Waterkeeper, Sierra Club, Torreon Community Alliance, Waterkeeper Alliance, WildEarth Guardians, and Wyoming Outdoor Council ("Commenters"), submit the following protest on the Bureau of Land Management ("BLM") New Mexico and Wyoming Q2 2026 Oil and Gas Lease Parcel Sales ("Lease Sale"). These sales include 11 nominated parcels of Federal Minerals administered by the Farmington Field Office, 62 nominated parcels of Federal Minerals administered by the Carlsbad and Roswell Field Offices, and 108 nominated parcels of Federal Minerals administered by the Wyoming State Office.[1] As detailed below, Commenters outline necessary components of an environmental

[1] A list of parcel numbers and serial numbers referenced in this comment letter is attached as **Appendix A** to this comment. A list of all exhibits to this comment is attached as **Appendix B**. Exhibits referenced herein and itemized in Appendix B and Appendix D for the New Mexico Q2 '26 sale were provided via a google drive at https://drive.google.com/drive/folders/1aNlNswM5ODkfLhLS4ci234XCPKoC_1iO?usp=share_link on December 17th, 2025, within the scoping comments. Exhibits referenced herin and itemized in Appendix B and D for the Wyoming comments were provided on a USB drive sent under separate cover via FedEx on November 13, 2025, and were delivered at the BLM Wyoming office on November 18, 2025, see delivery proof, **Appendix C**. Supplemental comments for each sale are provided in **Appendix D**.

review that must occur *before* BLM's proposed lease sales to meet its statutory obligations under NEPA, including informed decisionmaking and public disclosure, and under other substantive environmental laws. We protest the following parcels:

New Mexico Parcels

1	NM-2026-05-0663 NMNM106788111 NM, Farmington Field Office, BLM, PD T. 22 N., R. 6 W., New Mexico Principal Sec. 30 E1/2SE1/4. Sandoval County EOI #NM00020923
2	NM-2026-05-0664 NMNM106788112 NM, Farmington Field Office, BLM, PD T.23 N., R. 6 W., New Mexico Principal Sec. 13 N1/2. Rio Arriba County EOI #NM00020923
3	NM-2026-05-0411 NMNM106788113 NM, Farmington Field Office, BLM, PD T. 22 N., R. 7 W., New Mexico Principal Sec. 19 LOTS 1,2; Sec. 19 E1/2NW1/4. Sandoval County EOI #NM00016873
4	NM-2026-05-0671 NMNM106788114 NM, Farmington Field Office, BLM, PD T. 23 N., R. 8 W., New Mexico Principal Sec. 33 SW1/4. San Juan County EOI #NM00020923
5	NM-2026-05-0665 NMNM106788115 NM, Farmington Field Office, BLM, PD T. 24 N., R. 9 W., New Mexico Principal Sec. 3 SE1/4.
	San Juan County EOI #NM00020923
6	NM-2026-05-0666 NMNM106788116 NM, Farmington Field Office, BLM, PD T. 25 N., R. 9 W., New Mexico Principal Sec. 23 NE1/4, W1/2. San Juan County EOI #NM00020923
7	NM-2026-05-0667 NMNM106788117 NM, Farmington Field Office, BLM, PD T. 25 N., R. 9 W., New Mexico Principal Sec. 26 SE1/4. San Juan County EOI #NM00020923
8	NM-2026-05-0668 NMNM106788118 NM, Farmington Field Office, BLM, PD T. 25 N., R. 9 W., New Mexico Principal Sec. 34 S1/2NW1/4, N1/2SW1/4. San Juan County EOI #NM00020923
9	NM-2026-05-0669 NMNM106788119 NM, Farmington Field Office, BLM, PD T. 25 N., R. 11 W., New Mexico Principal Sec. 29 S1/2. San Juan County EOI #NM00020923
10	NM-2026-05-0670 NMNM106788120 NM, Farmington Field Office, BLM, PD T. 25 N., R. 11 W., New Mexico Principal Sec. 30 LOTS 2;

	Sec. 30 SE1/4NW1/4. San Juan County EOI #NM00020923
11	NM-2026-05-0672 NMNM106788121 NM, Farmington Field Office, BLM, PD T. 25 N., R. 11 W., New Mexico Principal Sec. 34 LOTS 20, 21, 23. San Juan County EOI #NM00020923
12	NM-2026-05-0599 Split Estate NMNM106788122 NM, Carlsbad Field Office, BLM, PD T. 25 S., R. 24 E., New Mexico Principal Sec. 12 N1/2, W1/2SW1/4, SE1/4SW1/4, E1/2SE1/4, SW1/4SE1/4. Eddy County EOI #NM00020141
13	NM-2026-05-0586 NMNM106788123 NM, Carlsbad Field Office, BLM, PD T. 20 S., R. 25 E., New Mexico Principal Sec. 1 NE1/4SE1/4. Eddy County EOI #NM00019301
14	NM-2026-05-0602 NMNM106788124 NM, Carlsbad Field Office, BLM, PD T. 22 S., R. 25 E., New Mexico Principal Sec. 3 LOTS 5 thru 12. Eddy County EOI #NM00020142
15	NM-2026-05-0645 NMNM106788125 NM, Carlsbad Field Office, BLM, PD T. 23 S., R. 25 E., New Mexico Principal Sec. 25 ALL. Eddy County

	EOI #NM00020453
16	NM-2026-05-0646 NMNM106788126 NM, Carlsbad Field Office, BLM, PD T. 24 S., R. 25 E., New Mexico Principal Sec. 1 S1/2NW1/4,SW1/4,S1/2SE1/4. Eddy County EOI #NM00020453
17	NM-2026-05-0600 Split Estate NMNM106788127 NM, Carlsbad Field Office, BLM, PD T. 24 S., R. 25 E., New Mexico Principal Sec. 25 SW1/4. Eddy County EOI #NM00020140
18	NM-2026-05-0597 Split Estate NMNM106788128 NM, Carlsbad Field Office, BLM, PD T. 25 S., R. 25 E., New Mexico Principal Sec. 6 LOTS 7; Sec. 6 SE1/4SW1/4; Sec. 7 LOTS 1,2,5 thru 17; Sec. 8 LOTS 1 thru 8; Sec. 8 E1/2; Sec. 17 NW1/4NE1/4,NE1/4NW1/4; Sec. 18 LOTS 1,2; Sec. 18 NE1/4NE1/4,W1/2NE1/4,E1/2NW 1/4. Eddy County EOI #NM00020138, NM00020141, NM00020440
19	NM-2026-05-0598 Split Estate NMNM106788129 NM, Carlsbad Field Office, BLM, PD T. 25 S., R. 25 E., New Mexico Principal Sec. 17 S1/2; Sec. 18 SE1/4SE1/4; Sec. 19 LOTS 1 thru 4;

	Sec. 19 NE1/4,E1/2NW1/4,E1/2SW1/4,N1/2SE1/4; Sec. 20 NW1/4,NW1/4SW1/4. Eddy County EOI #NM00020138
20	NM-2026-05-6895 NMNM106788130 NM, Carlsbad Field Office, BLM, PD T. 25 S., R. 25 E., New Mexico Principal Sec. 27 SE1/4. Eddy County EOI #NM00020139
21	NM-2026-05-6903 NMNM106788131 NM, Carlsbad Field Office, BLM, PD T. 25 S., R. 25 E., New Mexico Principal Sec. 31 LOTS 1 thru 4; Sec. 31 E1/2,E1/2W1/2. Eddy County EOI #NM00020139
22	NM-2026-05-6909 NMNM106788132 NM, Carlsbad Field Office, BLM, PD T. 21 S., R. 26 E., New Mexico Principal Sec. 24 LOTS 4 thru 6. Eddy County EOI #NM00020772
23	NM-2026-05-0614 NMNM106788133 NM, Carlsbad Field Office, BLM, PD T. 21 S., R. 26 E., New Mexico Principal Sec. 28 LOTS 9,10. Eddy County EOI #NM00019131, NM00020477
24	NM-2026-05-0591 Split Estate NMNM106788134 NM, Carlsbad Field Office, BLM, PD T. 24 S., R. 26 E., New Mexico Principal Sec. 7 LOTS 4; Sec. 7 SE1/4SW1/4.
	Eddy County EOI #NM00020083
25	NM-2026-05-0590 NMNM106788135 NM, Carlsbad Field Office, BLM, PD T. 26 S., R. 26 E., New Mexico Principal Sec. 7 LOTS 3, 4; Sec. 7 E1/2SW1/4, SE1/4; Sec. 18 LOTS 1. Eddy County EOI #NM00019872, NM00019873
26	NM-2026-05-0596 NMNM106788136 NM, Carlsbad Field Office, BLM, PD T. 26 S., R. 26 E., New Mexico Principal Sec. 30 E1/2; Sec. 31 LOTS 1,2; Sec. 31 N1/2NE1/4. Eddy County EOI #NM00020137
27	NM-2026-05-6810 Split Estate NMNM106788137 NM, Carlsbad Field Office, BLM, PD T. 17 S., R. 27 E., New Mexico Principal Sec. 6 NE1/4SW1/4, NW1/4SE1/4. Eddy County EOI #NM00018645
28	NM-2026-05-6901 NMNM106788138 NM, Carlsbad Field Office, BLM, PD T. 18 S., R. 27 E., New Mexico Principal Sec. 34 W1/2; Sec. 34 SE1/4. Eddy County EOI #NM00020386, NM00020387
29	NM-2026-05-0593 NMNM106788139 NM, Carlsbad Field Office, BLM, PD T. 20 S., R. 27 E., New Mexico Principal

	Sec. 9 SW1/4SE1/4. Eddy County EOI #NM00020102
30	NM-2026-05-0640 NMNM106788140 NM, Carlsbad Field Office, BLM, PD T. 16 S., R. 30 E., New Mexico Principal Sec. 11 N1/2NE1/4, SE1/4NE1/4,N1/2NW1/4, SW1/4NW1/4. Eddy County EOI #NM00020509
31	NM-2026-05-6904 NMNM106788141 NM, Carlsbad Field Office, BLM, PD T. 16 S., R. 30 E., New Mexico Principal Sec. 13 SW1/4. Eddy County EOI #NM00020509
32	NM-2026-05-0594 NMNM106788142 NM, Carlsbad Field Office, BLM, PD T. 16 S., R. 30 E., New Mexico Principal Sec. 14 W1/2. Eddy County EOI #NM00020126
33	NM-2026-05-6905 NMNM106788143 NM, Carlsbad Field Office, BLM, PD T. 16 S., R. 30 E., New Mexico Principal Sec. 23 SW1/4SE1/4. Eddy County EOI #NM00020509
34	NM-2026-05-6906 NMNM106788144 NM, Carlsbad Field Office, BLM, PD T. 16 S., R. 30 E., New Mexico Principal Sec. 24 E1/2NE1/4,N1/2SW1/4,SE1/4. Eddy County

	EOI #NM00020509
35	NM-2026-05-6907 NMNM106788145 NM, Carlsbad Field Office, BLM, PD T. 16 S., R. 30 E., New Mexico Principal Sec. 25 S1/2NW1/4. Eddy County EOI #NM00020509
36	NM-2026-05-0575 NMNM106788146 NM, Carlsbad Field Office, BLM, PD T. 18 S., R. 30 E., New Mexico Principal Sec. 15 W1/2SW1/4. Eddy County EOI #NM00019896
37	NM-2026-05-0648 NMNM106788147 NM, Carlsbad Field Office, BLM, PD T. 21 S., R. 30 E., New Mexico Principal Sec. 13 NE1/4, E1/2NW1/4, SW1/4NW1/4. Eddy County EOI #NM00020697
38	NM-2026-05-0649 NMNM106788148 NM, Carlsbad Field Office, BLM, PD T. 21 S., R. 30 E., New Mexico Principal Sec. 24 NE1/4. Eddy County EOI #NM00020701
39	NM-2026-05-0650 Split Estate NMNM106788149 NM, Carlsbad Field Office, BLM, PD T. 21 S., R. 31 E., New Mexico Principal Sec. 3 S1/2; Sec. 10 ALL. Eddy County EOI #NM00020706, NM00020708
40	NM-2026-05-0652 NMNM106788150

	NM, Carlsbad Field Office, BLM, PD T. 21 S., R. 31 E., New Mexico Principal Sec. 17 SE1/4; Sec. 20 NE1/4, S1/2; Sec. 29 ALL; Sec. 30 SE1/4SE1/4. Eddy County EOI #NM00020849, NM00020848, NM00020846, NM00020844
41	NM-2026-05-0743 NMNM106788151 NM, Carlsbad Field Office, BLM, PD T. 21 S., R. 31 E., New Mexico Principal EOI #NM00020847, NM00020849
42	NM-2026-05-0653 NMNM106788152 NM, Carlsbad Field Office, BLM, PD T. 22 S., R. 31 E., New Mexico Principal Sec. 5 LOTS 1 thru 4; Sec. 5 S1/2NE1/4, S1/2NW1/4, N1/2SW1/4, N1/2SE1/4, N1/2S1/2S1/2. Eddy County EOI #NM00020924
43	NM-2026-05-0654 NMNM106788153 NM, Carlsbad Field Office, BLM, PD T. 22 S., R. 31 E., New Mexico Principal Sec. 6 LOTS 3 thru 5; Sec. 6 SE1/4NW1/4. Eddy County EOI #NM00020920
44	NM-2026-05-0651 NMNM106788154 NM, Carlsbad Field Office, BLM, PD T. 22 S., R. 31 E., New Mexico Principal Sec. 8 ALL. Eddy County EOI #NM00020850
45	NM-2026-05-6908 NMNM106788155 NM, Carlsbad Field Office, DOE, PD T. 22 S., R. 31 E., New Mexico Principal Sec. 9 ALL; Sec. 10 SW1/4NE1/4,NW1/4NW1/4,S1/2NW1/4,S1/2. Eddy County EOI #NM00020851, NM00020852
46	NM-2026-05-0655 NMNM106788156 NM, Carlsbad Field Office, BLM, PD T. 22 S., R. 31 E., New Mexico Principal Sec. 11 SW1/4SW1/4; Sec. 14 SW1/4NE1/4, W1/2, NW1/4SE1/4, S1/2SE1/4. Eddy County EOI #NM00020853, NM00020854
47	NM-2026-05-0623 NMNM106788157 NM, Carlsbad Field Office, BLM, PD T. 18 S., R. 32 E., New Mexico Principal Sec. 19 N1/2SE1/4. Lea County EOI #NM00020271
48	NM-2026-05-0490 NMNM106788158 NM, Carlsbad Field Office, BLM, PD T. 20 S., R. 32 E., New Mexico Principal Sec. 9 NW1/4. Lea County EOI #NM00019369
49	NM-2026-05-0583 NMNM106788159 NM, Carlsbad Field Office, BLM, PD T. 21 S., R. 32 E., New Mexico Principal Sec. 26 NE1/4SW1/4,N1/2SE1/4. Lea County EOI #NM00019900

50	NM-2026-05-0639 Split Estate NMNM106788160 NM, Roswell Field Office, BLM, PD T. 9 N., R. 33 E., New Mexico Principal Sec. 18 LOTS 4; Sec. 18 NW1/4SE1/4,SE1/4SE1/4. Quay County EOI #NM00020388
51	NM-2026-05-0641 Split Estate NMNM106788161 NM, Roswell Field Office, BLM, PD T. 9 N., R. 33 E., New Mexico Principal Sec. 19 LOTS 3; Sec. 19 SW1/4NE1/4. Quay County EOI #NM00020388
52	NM-2026-05-0643 Split Estate NMNM106788162 NM, Roswell Field Office, BLM, PD T. 9 N., R. 33 E., New Mexico Principal Sec. 20 SW1/4NW1/4,E1/2SW1/4,SW1/4SE1/4. Quay County EOI #NM00020388
53	NM-2026-05-0616 Split Estate NMNM106788163 NM, Carlsbad Field Office, BLM, PD T. 22 S., R. 33 E., New Mexico Principal Sec. 13 N1/2,SW1/4. Lea County EOI #NM00020308
54	NM-2026-05-0551 NMNM106788164 NM, Carlsbad Field Office, BLM, PD T. 22 S., R. 33 E., New Mexico Principal Sec. 14 S1/2NW1/4, S1/2NE1/4, S1/2; Sec. 23 NW1/4, S1/2;
	Sec. 26 NW1/4NE1/4. Lea County EOI #NM00019842
55	NM-2026-05-6890 Split Estate NMNM106788165 NM, Carlsbad Field Office, BLM, PD T. 22 S., R. 33 E., New Mexico Principal Sec. 20 SW1/4SE1/4. Lea County EOI #NM00019848
56	NM-2026-05-0566 Split Estate NMNM106788166 NM, Carlsbad Field Office, BLM, PD T. 22 S., R. 33 E., New Mexico Principal Sec. 20 E1/2NE1/4; Sec. 21 NE1/4,N1/2NW1/4. Lea County EOI #NM00019848, NM00019897
57	NM-2026-05-0568 Split Estate NMNM106788167 NM, Carlsbad Field Office, BLM, PD T. 22 S., R. 33 E., New Mexico Principal Sec. 24 ALL; Sec. 25 NE1/4. Lea County EOI #NM00019848, NM00020310
58	NM-2026-05-6873 Split Estate NMNM106788168 NM, Carlsbad Field Office, BLM, PD T. 22 S., R. 33 E., New Mexico Principal Sec. 26 N1/2SE1/4, SE1/4SE1/4. Lea County EOI #NM00019843
59	NM-2026-05-6887 NMNM106788169 NM, Carlsbad Field Office, BLM, PD T. 22 S., R. 33 E., New Mexico Principal Sec. 27 ALL. Lea County EOI #NM00019895

60	NM-2026-05-0618 NMNM106788170 NM, Carlsbad Field Office, BLM, PD T. 22 S., R. 33 E., New Mexico Principal Sec. 28 ALL; Sec. 29 ALL. Lea County EOI #NM00020281
61	NM-2026-05-0661 NMNM106788171 NM, Carlsbad Field Office, BLM, PD T. 22 S., R. 33 E., New Mexico Principal Sec. 35 SW1/4SW1/4. Lea County EOI #NM00020870
62	NM-2026-05-0620 NMNM106788172 NM, Carlsbad Field Office, BLM, PD T. 23 S., R. 33 E., New Mexico Principal Sec. 4 LOTS 1 thru 4; Sec. 4 S1/2NE1/4,S1/2NW1/4,S1/2; Sec. 5 S1/2NE1/4, E1/2SE1/4. Lea County EOI #NM00020281
63	NM-2026-05-0595 NMNM106788173 NM, Carlsbad Field Office, BLM, PD T. 20 S., R. 34 E., New Mexico Principal Sec. 15 SW1/4SW1/4. Lea County EOI #NM00020136
64	NM-2026-05-6893 Split Estate NMNM106788174 NM, Carlsbad Field Office, BLM, PD T. 22 S., R. 34 E., New Mexico Principal Sec. 18 LOTS 3,4; Sec. 18 E1/2SW1/4,W1/2SE1/4; Sec. 19 LOTS 1 thru 4; Sec. 19 E1/2NW1/4,E1/2SW1/4. Lea County EOI #NM00019901, NM00020309
65	NM-2026-05-6898 Split Estate NMNM106788175 NM, Carlsbad Field Office, BLM, PD T. 23 S., R. 35 E., New Mexico Principal Sec. 1 LOTS 3,4; Sec. 1 SW1/4NW1/4,SW1/4; Sec. 12 ALL. Lea County EOI #NM00020390, NM00020392, NM00020393
66	NM-2026-05-0589 NMNM106788176 NM, Carlsbad Field Office, BLM, PD T. 23 S., R. 35 E., New Mexico Principal Sec. 3 LOTS 1 thru 4; Sec. 3 S1/2NE1/4, S1/2NW1/4, S1/2; Sec. 10 NE1/4, S1/2. Lea County EOI #NM00019870, NM00019871
67	NM-2026-05-0633 Split Estate NMNM106788177 NM, Carlsbad Field Office, BLM, PD T. 23 S., R. 35 E., New Mexico Principal Sec. 11 ALL; Sec. 14 N1/2,N1/2SW1/4,SE1/4SW1/4,SE1/4. Lea County EOI #NM00020391, NM00020395
68	NM-2026-05-6899 Split Estate NMNM106788178 NM, Carlsbad Field Office, BLM, PD T. 23 S., R. 35 E., New Mexico Principal Sec. 13 ALL; Sec. 24 ALL. Lea County EOI #NM00020394, NM00020398
69	NM-2026-05-0584 Split Estate NMNM106788179

	NM, Carlsbad Field Office, BLM, PD T. 23 S., R. 35 E., New Mexico Principal Sec. 15 NE1/4,W1/2,SW1/4SE1/4; Sec. 22 NW1/4NE1/4,S1/2NE1/4,W1/2,SE 1/4; Sec. 27 ALL. Lea County EOI #NM00019229, NM00020396, NM00020401
70	NM-2026-05-0637 Split Estate NMNM106788180 NM, Carlsbad Field Office, BLM, PD T. 23 S., R. 35 E., New Mexico Principal Sec. 23 NE1/4NE1/4,S1/2NE1/4,S1/2NW1/ 4,S1/2; Sec. 26 ALL. Lea County EOI #NM00020397, NM00020400
71	NM-2026-05-6900 Split Estate NMNM106788181 NM, Carlsbad Field Office, BLM, PD T. 23 S., R. 35 E., New Mexico Principal Sec. 25 ALL. Lea County EOI #NM00020399
72	NM-2026-05-0636 Split Estate NMNM106788182 NM, Carlsbad Field Office, BLM, PD T. 23 S., R. 36 E., New Mexico Principal Sec. 19 LOTS 1 thru 4; Sec. 19 E1/2,E1/2NW1/4,E1/2SW1/4; Sec. 30 LOTS 1 thru 4; Sec. 30 E1/2,E1/2NW1/4,E1/2SW1/4. Lea County EOI #NM00020402, NM00020403
73	NM-2026-05-0638 Split Estate NMNM106788183 NM, Carlsbad Field Office, BLM, PD T. 23 S., R. 36 E., New Mexico Principal Sec. 31 LOTS 3,4; Sec. 31 E1/2SW1/4. Lea County EOI #NM00020404
74	Texas TX-2026-05-0103 Split Estate TXNM106788184 TX, Oklahoma Field Office, BOR: Nueces River Project Office, ACQ Texas Sec. 1 TR TR 311 NR-87-2; Sec. 1 TR TR 311 NR-87-1. McMullen County EOI #NM00016023, NM00020090

Wyoming Parcels:

1	WY-2026-06-2247 Split Estate WYWY106788823 WY, Newcastle Field Office, BLM, PD T. 40 N., R. 63 W., Sixth Principal Sec. 6 LOTS 2, 3, 5; Sec. 6 SW1/4NE1/4, SE1/4NW1/4. Niobrara County EOI #WY00020148
2	WY-2026-06-2251 Split Estate WYWY106788824 WY, Newcastle Field Office, BLM, PD T. 40 N., R. 63 W., Sixth Principal Sec. 8 SW1/4. Niobrara County EOI #WY00020180
3	¶WY-2026-06-7081 WYWY106788825

	WY, Newcastle Field Office, FS:Thunder Basin National Grasslands, PD T. 42 N., R. 63 W., Sixth Principal Sec. 3 S1/2; Sec. 8 S1/2. Weston County EOI #WY00016681 FS Parcel#TB – 1101
4	¶WY-2026-06-7016 WYWY106788826 WY, Newcastle Field Office, FS:Thunder Basin National Grasslands, ACQ T. 48 N., R. 65 W., Sixth Principal Sec. 8 W1/2NE1/4, NW1/4SE1/4; Sec. 17 SW1/4NW1/4, N1/2SW1/4, SE1/4SW1/4, SE1/4. Weston County EOI #WY00016628 FS Parcel#TBNG-0480N-0650W-0004
5	¶WY-2026-06-7020 WYWY106788827 WY, Newcastle Field Office, FS:Thunder Basin National Grasslands, PD T. 48 N., R. 66 W., Sixth Principal Sec. 4 SW1/4NW1/4; Sec. 5 SE1/4NE1/4. Weston County EOI #WY00016624 FS Parcel#TB – 1052
6	WY-2026-06-0934 WYWY106788828 WY, Newcastle Field Office, FS:Thunder Basin National Grasslands, PD T. 48 N., R. 66 W., Sixth Principal Sec. 13 NENE (EXC 1.30 AC IN RR WYW0119068); Sec. 13 NW1/4NE1/4, SE1/4NE1/4. Weston County EOI #WY00016629 FS Parcel#TBNG-0480N-0660W-0003
7	¶WY-2026-06-2279 Split Estate WYWY106788829
	WY, Casper Field Office, BLM, PD T. 33 N., R. 67 W., Sixth Principal Sec. 6 LOTS 1; Sec. 6 NE1/4SE1/4, SW1/4SE1/4; Sec. 8 NE1/4SW1/4, N1/2SE1/4; Sec. 17 NW1/4SW1/4. Converse County EOI #WY00020315
8	¶WY-2026-06-2252 Split Estate WYWY106788830 WY, Casper Field Office, BLM, PD T. 32 N., R. 68 W., Sixth Principal Sec. 5 W1/2SE1/4. Converse County EOI #WY00020314
9	¶WY-2026-06-2269 Split Estate WYWY106788831 WY, Casper Field Office, BLM, PD T. 34 N., R. 68 W., Sixth Principal Sec. 15 SE1/4SE1/4. Converse County EOI #WY00020407
10	WY-2026-06-2278 Split Estate WYWY106788832 WY, Casper Field Office, BLM, PD T. 37 N., R. 70 W., Sixth Principal Sec. 3 NW1/4SE1/4; Sec. 4 LOTS 3, 4. Converse County EOI #WY00020316
11	WY-2026-06-7467 Split Estate WYWY106788833 WY, Casper Field Office, BLM, PD T. 37 N., R. 70 W., Sixth Principal Sec. 11 W1/2. Converse County EOI #WY00020152
12	WY-2026-06-7468 Split Estate WYWY106788834 WY, Casper Field Office, BLM, PD T. 37 N., R. 70 W., Sixth Principal Sec. 24 E1/2SE1/4. Converse County EOI #WY00020153
13	WY-2026-06-1662 Split Estate WYWY106788835

	WY, Buffalo Field Office, BLM, PD T. 41 N., R. 70 W., Sixth Principal Sec. 15 LOTS 1 thru 6; Sec. 20 LOTS 1 thru 16; Sec. 23 LOTS 1 thru 8. Campbell County EOI #WY00015687, WY00018317
14	WY-2026-06-2262 WYWY106788836 WY, Buffalo Field Office, BLM, PD T. 43 N., R. 70 W., Sixth Principal Sec. 19 LOTS 7 thru 10. Campbell County EOI #WY00020450
15	WY-2026-06-1906 WYWY106788837 WY, Buffalo Field Office, BLM, PD T. 46 N., R. 70 W., Sixth Principal Sec. 17 LOTS 1 thru 4, 6 thru 8; Sec. 18 LOTS 7, 8. Campbell County EOI #WY00019212
16	WY-2026-06-2295 Split Estate WYWY106788838 WY, Buffalo Field Office, BLM, PD T. 41 N., R. 71 W., Sixth Principal Sec. 10 LOTS 10, 15; Sec. 11 LOTS 11 thru 14; Sec. 14 LOTS 9,10,15,16. Campbell County EOI #WY00020549, WY00020548, WY00020547
17	WY-2026-06-7474 Split Estate WYWY106788839 WY, Buffalo Field Office, BLM, PD T. 41 N., R. 71 W., Sixth Principal Sec. 22 LOTS 10; Sec. 33 LOTS 1 thru 3, 9 thru 12. Converse, Campbell County EOI #WY00020560, WY00020559
18	WY-2026-06-7487 Split Estate WYWY106788840 WY, Buffalo Field Office, BLM, ACQ T. 42 N., R. 71 W., Sixth Principal Sec. 9 LOTS 7 thru 10.
	Campbell County EOI #WY00020563
19	WY-2026-06-2327 Split Estate WYWY106788841 WY, Buffalo Field Office, BLM, PD T. 43 N., R. 71 W., Sixth Principal Sec. 10 LOTS 12, 13. Campbell County EOI #WY00020567
20	WY-2026-06-1907 WYWY106788842 WY, Buffalo Field Office, BLM, PD T. 47 N., R. 71 W., Sixth Principal Sec. 13 LOTS 5, 12 thru 14; Sec. 23 LOTS 10, 13. Campbell County EOI #WY00019212
21	WY-2026-06-7273 Split Estate WYWY106788843 WY, Casper Field Office, BLM, PD T. 39 N., R. 72 W., Sixth Principal Sec. 17 NE1/4SE1/4, W1/2SW1/4; Sec. 19 LOTS 1 thru 3; Sec. 19 NE1/4, E1/2NW1/4,NE1/4SW1/4, N1/2SE1/4; Sec. 20 NE1/4NW1/4, SW1/4NW1/4. Converse County EOI #WY00018426
22	WY-2026-06-2326 Split Estate WYWY106788844 WY, Buffalo Field Office, BLM, PD T. 42 N., R. 72 W., Sixth Principal Sec. 3 LOTS 5, 6. Campbell County EOI #WY00020566
23	WY-2026-06-7349 WYWY106788845 WY, Casper Field Office, BLM, PD T. 39 N., R. 73 W., Sixth Principal Sec. 9 NE1/4SW1/4, S1/2SW1/4; Sec. 10 E1/2SW1/4. Converse County EOI #WY00016204
24	WY-2026-06-2331 Split Estate WYWY106788846

	WY, Casper Field Office, BLM, PD T. 36 N., R. 74 W., Sixth Principal Sec. 28 LOTS 1 thru 15; Sec. 28 SE1/4SE1/4; Sec. 29 LOTS 1 thru 16; Sec. 30 LOTS 5 thru 20. Converse County EOI #WY00020620
25	WY-2026-06-2285 WYWY106788847 WY, Casper Field Office, BLM, PD T. 38 N., R. 74 W., Sixth Principal Sec. 22 LOTS 5. Converse County EOI #WY00020529
26	WY-2026-06-2289 WYWY106788848 WY, Casper Field Office, BLM, PD T. 40 N., R. 74 W., Sixth Principal Sec. 11 NW1/4SW1/4, S1/2SW1/4, S1/2SE1/4; Sec. 12 W1/2NW1/4, W1/2SW1/4, SE1/4SW1/4. Converse County EOI #WY00020533
27	WY-2026-06-2264 Split Estate WYWY106788849 WY, Buffalo Field Office, BLM, PD T. 48 N., R. 74 W., Sixth Principal Sec. 3 LOTS 15 thru 18; Sec. 4 LOTS 7 thru 10, 15 thru 18; Sec. 5 LOTS 5 thru 20. Campbell County EOI #WY00020431
28	WY-2026-06-2263 Split Estate WYWY106788850 WY, Buffalo Field Office, BLM, PD T. 48 N., R. 74 W., Sixth Principal Sec. 20 LOTS 1 thru 16; Sec. 21 LOTS 1 thru 8; Sec. 28 LOTS 3 thru 6, 11, 12; Sec. 29 LOTS 3 thru 6. Campbell County EOI #WY00020432
29	WY-2026-06-2259 Split Estate WYWY106788851 WY, Buffalo Field Office, BLM, PD T. 49 N., R. 74 W., Sixth Principal Sec. 5 LOTS 8, 9; Sec. 17 LOTS 6, 11, 13, 14; Sec. 29 LOTS 3 thru 6, 11 thru 14; Sec. 30 LOTS 8, 9, 16, 17. Campbell County EOI #WY00020424, WY00020428, WY00020430, WY00020427
30	WY-2026-06-2257 Split Estate WYWY106788852 WY, Casper Field Office, BLM, PD T. 41 N., R. 75 W., Sixth Principal Sec. 31 LOTS 1 thru 4; Sec. 31 NE1/4, E1/2NW1/4, E1/2SW1/4, W1/2SE1/4. Converse County EOI #WY00020410
31	WY-2026-06-2255 Split Estate WYWY106788853 WY, Buffalo Field Office, BLM, PD T. 49 N., R. 75 W., Sixth Principal Sec. 30 LOTS 3,4. Campbell County EOI #WY00018567
32	WY-2026-06-2318 WYWY106788854 WY, Buffalo Field Office, BLM, PD T. 54 N., R. 77 W., Sixth Principal Sec. 25 NW1/4NE1/4, S1/2NE1/4, SE1/4. Sheridan County EOI #WY00020607
33	WY-2026-06-7473 WYWY106788855 WY, Rawlins Field Office, BLM, PD T. 20 N., R. 82 W., Sixth Principal Sec. 2 LOTS 1 thru 4; Sec. 2 S1/2. Carbon County EOI #WY00020552
34	WY-2026-06-2293 WYWY106788856 WY, Rawlins Field Office, BLM, PD T. 20 N., R. 82 W., Sixth Principal Sec. 10 ALL;

	Sec. 18 LOTS 1 thru 4; Sec. 18 E1/2NW1/4, E1/2SW1/4, E1/2. Carbon County EOI #WY00020532
35	WY-2026-06-2309 WYWY106788857 WY, Rawlins Field Office, BLM, PD T. 20 N., R. 82 W., Sixth Principal Sec. 14 ALL; Sec. 20 SE1/4NE1/4, W1/2NW1/4, S1/2. Carbon County EOI #WY00020553
36	WY-2026-06-7486 WYWY106788858 WY, Rawlins Field Office, BLM, PD T. 20 N., R. 83 W., Sixth Principal Sec. 4 S1/2NE1/4, S1/2NW1/4, S1/2. Carbon County EOI #WY00020668
37	WY-2026-06-2311 WYWY106788859 WY, Rawlins Field Office, BLM, PD T. 20 N., R. 83 W., Sixth Principal Sec. 10 ALL; Sec. 12 ALL; Sec. 14 ALL. Carbon County EOI #WY00020532, WY00020554
38	WY-2026-06-2452 Split Estate WYWY106788860 WY, Casper Field Office, BLM, PD T. 36 N., R. 87 W., Sixth Principal Sec. 5 LOTS 1, 2; Sec. 5 S1/2NE1/4, SE1/4; Sec. 6 LOTS 1 thru 5; Sec. 6 S1/2NE1/4, SE1/4NW1/4; Sec. 7 LOTS 1, 4; Sec. 7 N1/2NE1/4, NE1/4NW1/4, SE1/4SW1/4, S1/2SE1/4; Sec. 8 E1/2NE1/4;
	Sec. 17 S1/2NE1/4, S1/2NW1/4, S1/2; Sec. 18 LOTS 2 thru 4; Sec. 18 S1/2NE1/4, SE1/4NW1/4, E1/2SW1/4, SE1/4. Natrona County EOI #WY00020661
39	WY-2026-06-2333 Split Estate WYWY106788861 WY, Casper Field Office, BLM, PD T. 37 N., R. 87 W., Sixth Principal Sec. 4 LOTS 1 thru 4; Sec. 4 S1/2NE1/4, S1/2NW1/4, S1/2; Sec. 5 LOTS 1 thru 4; Sec. 5 S1/2NE1/4, S1/2NW1/4, S1/2; Sec. 6 LOTS 1 thru 7; Sec. 6 S1/2NE1/4, SE1/4NW1/4, E1/2SW1/4, SE1/4; Sec. 7 LOT 3, 4 (EXCL 6.26 AC IN RR WYC042124); Sec. 7 SESW, S2SE (EXCL 12.88 AC IN RR WYC042124); Sec. 7 LOTS 1, 2; Sec. 7 NE1/4, E1/2NW1/4, NE1/4SW1/4, N1/2SE1/4. Natrona County EOI #WY00020642
40	WY-2026-06-2337 Split Estate WYWY106788862 WY, Casper Field Office, BLM, PD T. 37 N., R. 87 W., Sixth Principal Sec. 8 ALL; Sec. 9 ALL; Sec. 17 NWNE, S2NE, N2NW (EXCL 25.13 AC IN RR WYC042124); Sec. 17 NE1/4NE1/4, S1/2NW1/4, S1/2. Natrona County EOI #WY00020642
41	WY-2026-06-2340 Split Estate WYWY106788863 WY, Casper Field Office, BLM, PD T. 37 N., R. 87 W., Sixth Principal

	Sec. 18 NENE (EXCL 6.17 AC IN RR WYC042124); Sec. 18 LOTS 1 thru 4; Sec. 18 NW1/4NE1/4, S1/2NE1/4, E1/2NW1/4, E1/2SW1/4, SE1/4; Sec. 19 LOTS 1 thru 4; Sec. 19 E1/2, E1/2NW1/4, E1/2SW1/4; Sec. 20 ALL. Natrona County EOI #WY00020642
42	WY-2026-06-7483 Split Estate WYWY106788864 WY, Casper Field Office, BLM, PD T. 37 N., R. 87 W., Sixth Principal Sec. 21 N1/2, SW1/4, N1/2SE1/4, SW1/4SE1/4; Sec. 28 W1/2NE1/4, NW1/4; Sec. 29 ALL; Sec. 30 LOTS 1 thru 4; Sec. 30 E1/2NW1/4, E1/2SW1/4, E1/2. Natrona County EOI #WY00020650
43	WY-2026-06-2359 Split Estate WYWY106788865 WY, Casper Field Office, BLM, PD T. 37 N., R. 87 W., Sixth Principal Sec. 31 LOTS 1, 2; Sec. 31 NE1/4, E1/2NW1/4; Sec. 32 ALL; Sec. 33 ALL; Sec. 34 ALL. Natrona County EOI #WY00020650
44	WY-2026-06-2336 Split Estate WYWY106788866 WY, Casper Field Office, BLM, PD T. 38 N., R. 87 W., Sixth Principal Sec. 17 LOTS 1 thru 8; Sec. 17 E1/2; Sec. 18 LOTS 1 thru 4; Sec. 18 NW1/4NE1/4, E1/2NW1/4, E1/2SW1/4; Sec. 19 LOTS 1 thru 4; Sec. 19 E1/2NW1/4, E1/2SW1/4, S1/2SE1/4;
	Sec. 20 LOTS 1 thru 9; Sec. 20 S1/2NE1/4, SE1/4SW1/4, W1/2SE1/4. Natrona County EOI #WY00020642
45	WY-2026-06-7477 Split Estate WYWY106788867 WY, Casper Field Office, BLM, PD T. 38 N., R. 87 W., Sixth Principal Sec. 29 LOTS 1 thru 4; Sec. 29 E1/2, SW1/4; Sec. 30 LOTS 1 thru 4; Sec. 30 E1/2, E1/2NW1/4, E1/2SW1/4; Sec. 31 LOTS 1 thru 4; Sec. 31 E1/2, E1/2NW1/4, E1/2SW1/4; Sec. 32 N1/2NE1/4, SW1/4NE1/4, NW1/4, S1/2. Natrona County EOI #WY00020642
46	WY-2026-06-7496 Split Estate WYWY106788868 WY, Casper Field Office, BLM, PD T. 36 N., R. 88 W., Sixth Principal Sec. 10 ALL; Sec. 11 S1/2NE1/4, S1/2NW1/4, S1/2; Sec. 12 N1/2NE1/4, NE1/4NW1/4, NE1/4SW1/4, S1/2SW1/4, NW1/4SE1/4. Natrona County EOI #WY00020662
47	WY-2026-06-2419 Split Estate WYWY106788869 WY, Casper Field Office, BLM, PD T. 36 N., R. 88 W., Sixth Principal Sec. 13 S1/2NE1/4, N1/2NW1/4, SE1/4NW1/4, SE1/4SW1/4, SE1/4; Sec. 14 N1/2NE1/4, W1/2NW1/4, S1/2; Sec. 15 NW1/4, S1/2. Natrona County EOI #WY00020662
48	WY-2026-06-2363 Split Estate WYWY106788870

	WY, Casper Field Office, BLM, PD T. 37 N., R. 88 W., Sixth Principal Sec. 1 LOTS 1 thru 7; Sec. 1 SW1/4NE1/4, S1/2NW1/4, SW1/4, W1/2SE1/4; Sec. 2 LOTS 1, 4; Sec. 2 S1/2NE1/4, S1/2NW1/4, S1/2; Sec. 3 LOTS 1 thru 4; Sec. 3 S1/2NE1/4, S1/2NW1/4, S1/2; Sec. 4 SESW, S2SE (EXCL 15.44 AC IN RR WYC042124); Sec. 4 LOTS 1 thru 4; Sec. 4 S1/2NE1/4, S1/2NW1/4, N1/2SW1/4, N1/2SE1/4. Natrona County EOI #WY00020650
49	WY-2026-06-2367 Split Estate WYWY106788871 WY, Casper Field Office, BLM, PD T. 37 N., R. 88 W., Sixth Principal Sec. 5 SW (EXCL 12.04 AC IN RR WYC042124); Sec. 5 LOTS 1 thru 4; Sec. 5 S1/2NE1/4, S1/2NW1/4, N1/2SE1/4; Sec. 6 NESW, N2SE (EXCL 18.15 AC IN RR WYC042124); Sec. 6 LOTS 1 thru 4; Sec. 6 S1/2NE1/4, S1/2NW1/4, S1/2SW1/4, SW1/4SE1/4. Natrona County EOI #WY00020650
50	WY-2026-06-2349 Split Estate WYWY106788872 WY, Casper Field Office, BLM, PD T. 37 N., R. 88 W., Sixth Principal Sec. 7 NW1/4NE1/4, S1/2NE1/4, NW1/4, S1/2; Sec. 8 NW1/4NE1/4, S1/2NE1/4, W1/2, N1/2SE1/4, SW1/4SE1/4; Sec. 9 NENE (EXCL 3.05 AC IN RR WYC 042124); Sec. 9 NW1/4NE1/4, S1/2NE1/4, NW1/4, N1/2SW1/4, SE1/4SW1/4, SE1/4; Sec. 10 NWNE, S2NE, N2NW (EXCL 25.10 AC IN RR WYC042124); Sec. 10 NE1/4NE1/4, S1/2NW1/4, S1/2. Natrona County EOI #WY00020656
51	WY-2026-06-2353 Split Estate WYWY106788873 WY, Casper Field Office, BLM, PD T. 37 N., R. 88 W., Sixth Principal Sec. 11 SWNE, SWNW (EXCL 8.43 AC IN RR WYC042124); Sec. 11 N1/2NE1/4, SE1/4NE1/4, N1/2NW1/4, NW1/4SW1/4, S1/2SW1/4, S1/2SE1/4; Sec. 12 LOT 4 (EXCL 4.68 AC IN RR WYC042124); Sec. 12 SWSE (EXCL 1.33 AC IN RR WYC042124); Sec. 12 LOTS 1 thru 3; Sec. 12 W1/2NE1/4, NW1/4, S1/2SW1/4; Sec. 13 LOTS 1 thru 4; Sec. 13 W1/2NE1/4, W1/2, W1/2SE1/4; Sec. 14 ALL. Natrona County EOI #WY00020656
52	WY-2026-06-2357 Split Estate WYWY106788874 WY, Casper Field Office, BLM, PD T. 37 N., R. 88 W., Sixth Principal Sec. 15 ALL; Sec. 17 ALL; Sec. 18 E1/2, NW1/4; Sec. 20 ALL. Natrona County EOI #WY00020656
53	WY-2026-06-2361 Split Estate WYWY106788875 WY, Casper Field Office, BLM, PD T. 37 N., R. 88 W., Sixth Principal Sec. 21 ALL; Sec. 22 ALL; Sec. 23 ALL; Sec. 24 LOTS 1 thru 4;

	Sec. 24 W1/2NE1/4, W1/2, W1/2SE1/4. Natrona County EOI #WY00020656
54	WY-2026-06-7482 Split Estate WYWY106788876 WY, Casper Field Office, BLM, PD T. 37 N., R. 88 W., Sixth Principal Sec. 25 LOTS 1 thru 4; Sec. 25 W1/2NE1/4, W1/2, W1/2SE1/4; Sec. 26 ALL; Sec. 27 ALL; Sec. 28 ALL. Natrona County EOI #WY00020656
55	WY-2026-06-2454 Split Estate WYWY106788877 WY, Casper Field Office, BLM, PD T. 37 N., R. 88 W., Sixth Principal Sec. 29 ALL; Sec. 30 ALL; Sec. 31 LOTS 1 thru 4; Sec. 31 N1/2NE1/4, N1/2NW1/4, N1/2SW1/4, N1/2SE1/4; Sec. 32 LOTS 1 thru 4; Sec. 32 N1/2NE1/4, SE1/4NE1/4, NW1/4, N1/2SW1/4. Natrona County EOI #WY00020661
56	WY-2026-06-2455 Split Estate WYWY106788878 WY, Casper Field Office, BLM, PD T. 37 N., R. 88 W., Sixth Principal Sec. 33 LOTS 2 thru 4; Sec. 33 N1/2; Sec. 34 LOTS 1, 3; Sec. 34 NE1/4, N1/2SW1/4, N1/2SE1/4; Sec. 35 LOTS 1 thru 4; Sec. 35 N1/2, N1/2SW1/4, N1/2SE1/4. Natrona County EOI #WY00020661
57	WY-2026-06-7478 WYWY106788879 WY, Casper Field Office, BLM, PD

	T. 38 N., R. 88 W., Sixth Principal Sec. 8 NE1/4; Sec. 9 ALL; Sec. 33 ALL. Natrona County EOI #WY00020638
58	WY-2026-06-2342 Split Estate WYWY106788880 WY, Casper Field Office, BLM, PD T. 38 N., R. 88 W., Sixth Principal Sec. 10 ALL; Sec. 11 ALL; Sec. 12 LOTS 1 thru 4; Sec. 12 W1/2NE1/4, W1/2, W1/2SE1/4; Sec. 13 LOTS 1 thru 4; Sec. 13 W1/2NE1/4, W1/2, W1/2SE1/4. Natrona County EOI #WY00020638
59	WY-2026-06-2346 Split Estate WYWY106788881 WY, Casper Field Office, BLM, PD T. 38 N., R. 88 W., Sixth Principal Sec. 14 ALL; Sec. 17 S1/2SW1/4, S1/2SE1/4; Sec. 21 ALL; Sec. 22 ALL. Natrona County EOI #WY00020638
60	WY-2026-06-2347 Split Estate WYWY106788882 WY, Casper Field Office, BLM, PD T. 38 N., R. 88 W., Sixth Principal Sec. 15 ALL; Sec. 23 ALL. Natrona County EOI #WY00020638
61	WY-2026-06-2352 Split Estate WYWY10678888 WY, Casper Field Office, BLM, PD T. 38 N., R. 88 W., Sixth Principal Sec. 24 LOTS 1 thru 4; Sec. 24 W1/2NE1/4, NW1/4NW1/4, S1/2NW1/4, SW1/4, W1/2SE1/4; Sec. 25 LOTS 1 thru 4;

	Sec. 25 W1/2NE1/4, W1/2, W1/2SE1/4; Sec. 26 ALL. Natrona County EOI #WY00020638
62	WY-2026-06-2355 Split Estate WYWY106788884 WY, Casper Field Office, BLM, PD T. 38 N., R. 88 W., Sixth Principal Sec. 27 ALL; Sec. 28 NE1/4, NW1/4NW1/4, S1/2NW1/4, SW1/4, N1/2SE1/4; Sec. 31 LOTS 1 thru 4; Sec. 31 E1/2NW1/4, E1/2SW1/4, E1/2; Sec. 32 ALL. Natrona County EOI #WY00020638
63	WY-2026-06-2338 Split Estate WYWY106788885 WY, Casper Field Office, BLM, PD T. 38 N., R. 88 W., Sixth Principal Sec. 34 ALL; Sec. 35 ALL. Natrona County EOI #WY00020642
64	WY-2026-06-2376 Split Estate WYWY106788886 WY, Rawlins Field Office, BLM, PD T. 14 N., R. 90 W., Sixth Principal Sec. 6 LOTS 8 thru 14; Sec. 6 S1/2NE1/4, SE1/4NW1/4, E1/2SW1/4, SE1/4. Carbon County EOI #WY00020680
65	WY-2026-06-2379 Split Estate WYWY106788887 WY, Rawlins Field Office, BLM, PD T. 14 N., R. 90 W., Sixth Principal Sec. 7 LOTS 5 thru 8; Sec. 7 E1/2, E1/2NW1/4, E1/2SW1/4; Sec. 8 NE1/4, W1/2. Carbon County EOI #WY00020684, WY00020686
66	WY-2026-06-7475 Split Estate WYWY106788888
	WY, Rawlins Field Office, BLM, PD T. 14 N., R. 90 W., Sixth Principal Sec. 17 ALL; Sec. 20 ALL; Sec. 28 ALL; Sec. 29 ALL. Carbon County EOI #WY00020612, WY00020613, WY00020614, WY00020615
67	WY-2026-06-2407 Split Estate WYWY106788889 WY, Rawlins Field Office, BLM, PD T. 14 N., R. 90 W., Sixth Principal Sec. 18 LOTS 5 thru 8; Sec. 18 E1/2, E1/2NW1/4, E1/2SW1/4; Sec. 19 LOTS 5 thru 8; Sec. 19 E1/2, E1/2NW1/4, E1/2SW1/4; Sec. 21 NE1/4NE1/4, S1/2NE1/4, NW1/4, S1/2. Carbon County EOI #WY00020689, WY00020695, WY00020700
68	WY-2026-06-2354 Split Estate WYWY106788890 WY, Rawlins Field Office, BLM, PD T. 15 N., R. 90 W., Sixth Principal Sec. 30 LOTS 7, 8; Sec. 30 E1/2SW1/4, SW1/4SE1/4; Sec. 32 SW1/4. Carbon County EOI #WY00020663, WY00020664
69	WY-2026-06-2323 Split Estate WYWY106788891 WY, Rawlins Field Office, BLM, PD T. 15 N., R. 90 W., Sixth Principal Sec. 31 LOTS 5 thru 8; Sec. 31 E1/2, E1/2NW1/4, E1/2SW1/4. Carbon County EOI #WY00020611

70	WY-2026-06-2364 WYWY106788892 WY, Lander Field Office, BLM, PD T. 38 N., R. 90 W., Sixth Principal Sec. 18 SE1/4; Sec. 19 LOTS 3 thru 9; Sec. 19 S1/2NE1/4, SE1/4NW1/4, E1/2SW1/4, SE1/4; Sec. 20 LOT 1 (EXCL 5.34 AC IN RR WYD039337); Sec. 20 SENE (EXCL 0.03 AC IN RR WYD39337); Sec. 20 LOTS 2 thru 4; Sec. 20 SW1/4NE1/4, S1/2NW1/4, S1/2; Sec. 21 LOT 4 (EXCL 0.64 AC IN WYD039337); Sec. 21 SWNW (EXCL 6.70 AC IN WYD039337); Sec. 21 W2SW (EXCL 12.40 AC IN WYD039337); Sec. 21 LOTS 1 thru 3; Sec. 21 S1/2NE1/4, SE1/4NW1/4, E1/2SW1/4, SE1/4. Fremont County EOI #WY00020518
71	WY-2026-06-2366 WYWY106788893 WY, Lander Field Office, BLM, PD T. 38 N., R. 90 W., Sixth Principal Sec. 22 LOTS 1 thru 4; Sec. 22 S1/2NE1/4, S1/2NW1/4, S1/2; Sec. 27 S2NW (EXCL 9.48 AC IN RR WYD039337); Sec. 27 NE1/4, N1/2NW1/4; Sec. 28 S2NE, N2NW, SENW (EXCL 21.43 AC IN RR WYD039337); Sec. 28 N1/2NE1/4, SW1/4NW1/4; Sec. 29 SE1/4; Sec. 30 LOTS 1 thru 4; Sec. 30 E1/2, E1/2NW1/4, E1/2SW1/4. Fremont County EOI #WY00020518
72	WY-2026-06-7488 Split Estate WYWY106788894 WY, Rawlins Field Office, BLM, PD T. 14 N., R. 91 W., Sixth Principal Sec. 1 LOTS 6; Sec. 1 SW1/4NE1/4, S1/2NW1/4, SW1/4, W1/2SE1/4. Carbon County EOI #WY00020665
73	WY-2026-06-2362 Split Estate WYWY106788895 WY, Rawlins Field Office, BLM, PD T. 14 N., R. 91 W., Sixth Principal Sec. 2 LOTS 5 thru 8; Sec. 2 S1/2NE1/4, SE1/4; Sec. 24 LOTS 1 thru 4; Sec. 24 W1/2NE1/4, E1/2NW1/4, E1/2SW1/4, W1/2SE1/4. Carbon County EOI #WY00020667, WY00020666
74	WY-2026-06-7502 Split Estate WYWY106788896 WY, Rawlins Field Office, BLM, PD T. 15 N., R. 91 W., Sixth Principal Sec. 22 E1/2. Carbon County EOI #WY00020658
75	WY-2026-06-2393 Split Estate WYWY106788897 WY, Rawlins Field Office, BLM, PD T. 16 N., R. 91 W., Sixth Principal Sec. 12 NW1/4NE1/4, SE1/4NE1/4, NW1/4SW1/4, E1/2SE1/4. Carbon County EOI #WY00020636
76	WY-2026-06-2332 Split Estate WYWY106788898 WY, Rawlins Field Office, BLM, PD T. 16 N., R. 91 W., Sixth Principal

	Sec. 13 E1/2, NE1/4NW1/4, E1/2SW1/4, SW1/4SW1/4; Sec. 24 W1/2. Carbon County EOI #WY00020637, WY00020639
77	WY-2026-06-2375 Split Estate WYWY106788899 WY, Rawlins Field Office, BLM, PD T. 16 N., R. 91 W., Sixth Principal Sec. 34 W1/2NW1/4, S1/2. Carbon County EOI #WY00020595
78	WY-2026-06-7484 WYWY106788900 WY, Lander Field Office, BLM, PD T. 37 N., R. 91 W., Sixth Principal Sec. 24 LOTS 1 thru 3; Sec. 24 W1/2NE1/4, E1/2NW1/4, NE1/4SW1/4, SW1/4SW1/4, NW1/4SE1/4. Fremont County EOI #WY00020518
79	WY-2026-06-7485 WYWY106788901 WY, Lander Field Office, BLM, PD T. 38 N., R. 91 W., Sixth Principal Sec. 23 ALL; Sec. 26 ALL; Sec. 27 ALL; Sec. 28 ALL. Fremont County EOI #WY00020518
80	WY-2026-06-2360 WYWY106788902 WY, Lander Field Office, BLM, PD T. 38 N., R. 91 W., Sixth Principal Sec. 29 NE1/4NW1/4, S1/2NW1/4, SW1/4; Sec. 31 LOTS 1 thru 10; Sec. 31 NE1/4, E1/2NW1/4, NE1/4SW1/4, N1/2SE1/4. Fremont County EOI #WY00020518
81	WY-2026-06-2287 Split Estate WYWY106788903 WY, Lander Field Office, BLM, PD
	T. 38 N., R. 91 W., Sixth Principal Sec. 30 LOTS 1 thru 8; Sec. 30 E1/2, E1/2NW1/4, E1/2SW1/4. Fremont County EOI #WY00020496
82	WY-2026-06-7479 Split Estate WYWY106788904 WY, Rawlins Field Office, BLM, PD T. 16 N., R. 92 W., Sixth Principal Sec. 2 LOTS 9 thru 20; Sec. 2 S1/2; Sec. 3 LOTS 9 thru 20; Sec. 3 S1/2; Sec. 23 S1/2; Sec. 28 E1/2. Carbon County EOI #WY00020647, WY00020648, WY00020649, WY00020651
83	WY-2026-06-2381 Split Estate WYWY106788905 WY, Rawlins Field Office, BLM, PD T. 16 N., R. 92 W., Sixth Principal Sec. 9 ALL; Sec. 22 ALL; Sec. 26 ALL. Carbon County EOI #WY00020602, WY00020603, WY00020604
84	WY-2026-06-2382 Split Estate WYWY106788906 WY, Rawlins Field Office, BLM, PD T. 16 N., R. 92 W., Sixth Principal Sec. 27 ALL; Sec. 34 ALL; Sec. 35 ALL. Carbon County EOI #WY00020605, WY00020606, WY00020608
85	WY-2026-06-2365 Split Estate WYWY106788907 WY, Rawlins Field Office, BLM, PD

	T. 17 N., R. 92 W., Sixth Principal Sec. 24 LOTS 13 thru 16; Sec. 35 LOTS 1 thru 8. Carbon County EOI #WY00020645, WY00020646
86	WY-2026-06-2380 Split Estate WYWY106788908 WY, Rawlins Field Office, BLM, PD T. 17 N., R. 92 W., Sixth Principal Sec. 26 ALL. Carbon County EOI #WY00020597
87	WY-2026-06-2288 Split Estate WYWY106788909 WY, Lander Field Office, BLM, PD T. 39 N., R. 92 W., Sixth Principal Sec. 31 LOTS 1; Sec. 31 N1/2NE1/4, NE1/4NW1/4. Fremont County EOI #WY00020496
88	WY-2026-06-2443 WYWY106788910 WY, Rawlins Field Office, BLM, PD T. 15 N., R. 94 W., Sixth Principal Sec. 3 LOTS 1 thru 4; Sec. 3 S1/2NE1/4, S1/2NW1/4, S1/2. Sweetwater County EOI #WY00020720
89	WY-2026-06-2372 WYWY106788911 WY, Rawlins Field Office, BLM, PD T. 16 N., R. 94 W., Sixth Principal Sec. 14 ALL; Sec. 15 ALL; Sec. 17 ALL. Sweetwater County EOI #WY00020669
90	WY-2026-06-2402 WYWY106788912 WY, Rawlins Field Office, BLM, PD
	T. 16 N., R. 94 W., Sixth Principal Sec. 19 LOTS 1 thru 4; Sec. 19 E1/2, E1/2NW1/4, E1/2SW1/4; Sec. 21 ALL; Sec. 22 ALL. Sweetwater County EOI #WY00020671, WY00020672
91	WY-2026-06-7492 WYWY106788913 WY, Rawlins Field Office, BLM, PD T. 16 N., R. 94 W., Sixth Principal Sec. 23 ALL; Sec. 26 ALL; Sec. 28 ALL; Sec. 29 S1/2. Sweetwater County EOI #WY00020674, WY00020675
92	WY-2026-06-7493 WYWY106788914 WY, Rawlins Field Office, BLM, PD T. 16 N., R. 94 W., Sixth Principal Sec. 30 LOTS 1 thru 4; Sec. 30 E1/2, E1/2NW1/4, E1/2SW1/4; Sec. 31 LOTS 1 thru 4; Sec. 31 E1/2, E1/2NW1/4, E1/2SW1/4; Sec. 32 ALL. Sweetwater County EOI #WY00020677, WY00020679, WY00020681
93	WY-2026-06-7489 WYWY106788915 WY, Rawlins Field Office, BLM, PD T. 16 N., R. 94 W., Sixth Principal Sec. 33 ALL. Sweetwater County EOI #WY00020683
94	WY-2026-06-2388 WYWY106788916 WY, Rawlins Field Office, BLM, PD T. 17 N., R. 94 W., Sixth Principal Sec. 6 LOTS 3 thru 7;

	Sec. 6 SE1/4NW1/4, E1/2SW1/4, SE1/4. Sweetwater County EOI #WY00020622
95	WY-2026-06-2459 WYWY106788917 WY, Rawlins Field Office, BLM, PD T. 19 N., R. 94 W., Sixth Principal Sec. 6 LOTS 1 thru 7; Sec. 6 S1/2NE1/4, SE1/4NW1/4, E1/2SW1/4, SE1/4; Sec. 12 NE1/4. Sweetwater County EOI #WY00020724
96	WY-2026-06-7495 Split Estate WYWY106788918 WY, Rawlins Field Office, BLM, PD T. 20 N., R. 94 W., Sixth Principal Sec. 30 LOTS 5 thru 20; Sec. 34 LOTS 1 thru 10; Sec. 34 NW1/4NE1/4NW1/4NW1/4, NE1/4NW1/4NW1/4NW1/4, SE1/4NW1/4NW1/4, NE1/4SW1/4NW1/4. Sweetwater County EOI #WY00020682
97	WY-2026-06-7494 WYWY106788919 WY, Rawlins Field Office, BLM, PD T. 16 N., R. 95 W., Sixth Principal Sec. 8 ALL; Sec. 17 E1/2SE1/4. Sweetwater County EOI #WY00020693, WY00020703
98	WY-2026-06-2435 WYWY106788920 WY, Rawlins Field Office, BLM, PD T. 16 N., R. 95 W., Sixth Principal Sec. 18 LOTS 1 thru 4; Sec. 18 E1/2, E1/2NW1/4, E1/2SW1/4; Sec. 19 LOTS 3, 4;
	Sec. 19 E1/2NE1/4, E1/2SW1/4, SE1/4; Sec. 20 ALL. Sweetwater County EOI #WY00020707, WY00020710, WY00020711
99	WY-2026-06-7499 WYWY106788921 WY, Rawlins Field Office, BLM, PD T. 16 N., R. 95 W., Sixth Principal Sec. 25 ALL; Sec. 30 LOTS 1 thru 4; Sec. 30 E1/2, E1/2NW1/4, E1/2SW1/4; Sec. 31 LOTS 1; Sec. 31 NE1/4NW1/4. Sweetwater County EOI #WY00020715, WY00020716, WY00020718
100	WY-2026-06-2461 WYWY106788922 WY, Rawlins Field Office, BLM, PD T. 19 N., R. 95 W., Sixth Principal Sec. 2 LOTS 1 thru 4; Sec. 2 S1/2NE1/4, S1/2NW1/4, S1/2. Sweetwater County EOI #WY00020724
101	WY-2026-06-7490 WYWY106788923 WY, Rock Springs Field Office, BLM, PD T. 17 N., R. 96 W., Sixth Principal Sec. 34 ALL. Sweetwater County EOI #WY00020694
102	WY-2026-06-2447 Split Estate WYWY10678892 WY, Rawlins Field Office, BLM, PD T. 20 N., R. 96 W., Sixth Principal Sec. 24 S1/2. Sweetwater County EOI #WY00020721
103	WY-2026-06-2294 WYWY106788925

	WY, Rawlins Field Office, BLM, PD T. 23 N., R. 96 W., Sixth Principal Sec. 25 N1/2SW1/4SW1/4, N1/2SE1/4SW1/4. Sweetwater County EOI #WY00020510
104	WY-2026-06-2046 Split Estate WYWY106788926 WY, Pinedale Field Office, BLM, PD T. 30 N., R. 113 W., Sixth Principal Sec. 18 LOTS 1 thru 4; Sec. 18 E1/2NW1/4, E1/2SW1/4, NW1/4SE1/4; Sec. 19 LOTS 1 thru 3; Sec. 19 E1/2, E1/2NW1/4, NE1/4SW1/4; Sec. 30 NE1/4NE1/4. Sublette County EOI #WY00018575
105	WY-2026-06-2038 Split Estate WYWY106788927 WY, Pinedale Field Office, BLM, PD T. 29 N., R. 114 W., Sixth Principal Sec. 11 SW1/4NE1/4, W1/2, SE1/4; Sec. 12 NW1/4SW1/4, S1/2SW1/4, S1/2SE1/4; Sec. 13 ALL; Sec. 14 ALL. Sublette County EOI #WY00018548, WY00018546
106	WY-2026-06-2067 Split Estate WYWY106788928 WY, Pinedale Field Office, BLM, PD

	T. 30 N., R. 114 W., Sixth Principal Sec. 9 N1/2, N1/2SW1/4; Sec. 10 N1/2, SW1/4, N1/2SE1/4, SW1/4SE1/4; Sec. 12 N1/2NE1/4, SE1/4NE1/4, NW1/4, W1/2SW1/4, SE1/4SW1/4, S1/2SE1/4. Sublette County EOI #WY00018560, WY00018557
107	WY-2026-06-2088 Split Estate WYWY106788929 WY, Pinedale Field Office, BLM, PD T. 30 N., R. 114 W., Sixth Principal Sec. 17 W1/2; Sec. 18 LOTS 1 thru 4; Sec. 18 E1/2, E1/2NW1/4, E1/2SW1/4; Sec. 19 LOTS 1 thru 4; Sec. 19 E1/2, E1/2NW1/4, E1/2SW1/4; Sec. 20 E1/2, S1/2SW1/4. Sublette Count EOI #WY00018551, WY00018549
108	WY-2026-06-2073 Split Estate WYWY106788930 WY, Pinedale Field Office, BLM, PD T. 30 N., R. 114 W., Sixth Principal Sec. 20 NW1/4, N1/2SW1/4; Sec. 21 SW1/4. Sublette County EOI #WY00018555, WY00018551, WY00018549

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I, Morgan O'Grady, have been authorized to file this comment letter on behalf of the above groups.

INTERESTS AND PARTICIPATION OF COMMENTING PARTIES

The **Center for Biological Diversity ("Center")** is a non-profit environmental organization dedicated to the protection of native species and their habitats through science, policy, and environmental law. The Center also works to reduce greenhouse gas

emissions to protect biological diversity, our environment, and public health. The Center has over one million members and activists, including those living in the Wyoming who have visited these public lands for recreational, scientific, educational, and other pursuits and intend to continue to do so in the future, and are particularly interested in protecting the many native, imperiled, and sensitive species and their habitats that may be affected by the proposed oil and gas leasing.

The Chaco Alliance formed in 2006 in opposition to an attempt to chip seal the main road into Chaco (CR 7950) without any impact studies that would protect Chaco Culture National Historical Park (CCNHP), or the archeological sites in and along the road. We continue to believe that energy development is incompatible with cultural resource protection. We have called for many years for a moratorium on all new drilling in the greater Chaco landscape until a new Regional Management Plan has been adopted. The Chaco Alliance has been a member of the Greater Chaco Coalition since 2015. We have long demanded environmental justice, an end to the sacrifice zone mentality that has created an industrialized landscape that threatens communities and sacred sites.

Citizens Caring for the Future ("CCFF") is an unincorporated non-profit membership association based in southeastern New Mexico in the Permian Basin. CCFF's mission is to bring together southeastern New Mexico community members who support protecting the air, water and public health and safety during the current oil and gas boom in the Permian. The organization seeks to find an informed and safe path to ensure protections for the local community in the face of the health, safety and environmental dangers posed by rapid oil and gas development in the greater Carlsbad region of southeastern New Mexico.

The **Coalition to Protect America's National Parks** aims to use its credibility and integrity to continue supporting the National Park Service's mission and employees, and to advocate for national park solutions based on law and sound science. Our members include former National Park Service directors, deputy directors, regional directors, superintendents, park rangers (both law enforcement and interpretive), maintenance professionals, administrative staff, and many other dedicated career professionals. On average, each member has spent 20 years protecting, interpreting, and maintaining America's national parks for the public.

Living Rivers and Colorado Riverkeeper promotes river restoration through mobilization. By articulating conservation and alternative management strategies to the public, they seek to revive the natural habitat and spirit of rivers by undoing the extensive damage done by dams, diversions and pollution on the Colorado Plateau.

Sierra Club is the nation's oldest grassroots environmental organization. Sierra Club promotes the responsible use of the Earth's ecosystem and resources and works to restore the quality of the natural and human environment. In addition to organizing nature outings and public education campaigns, Sierra Club and its members pursue advocacy and litigation on issues including clean air, clean water, solid waste reduction, and sustainable land use policies. Sierra Club also has a Beyond Dirty Fuels Campaign, which, *inter alia*, seeks to halt or minimize the adverse impacts of fossil fuel development, including extraction activities, on the climate, surrounding communities, and the environment. The Sierra Club's Rio Grande Chapter includes over 7,900 members who are dedicated to exploring, enjoying, and protecting New Mexico's

natural resources, wild places, and public lands, which include areas that would be impacted by these leasing activities. Sierra Club has members who live, work, and recreate in areas that would be impacted by these lease sales.

Torreon Community Alliance is an all-Navajo non-profit organization that is charged with redeveloping harmoniously and sustainably the Torreon/Starlake land, education, culture, and community systems.

Waterkeeper Alliance is a not-for-profit, member supported, international environmental organization based in New York City. Waterkeeper Alliance unites more than 300 Waterkeeper Organizations and Affiliates on the frontlines of the global water crisis, patrolling and protecting more than 5.9 million square miles of rivers, lakes, and coastal waterways on six continents. Waterkeeper Alliance's member and affiliate "Waterkeeper groups" defend our fundamental human right to drinkable, fishable and swimmable waters, and combine firsthand knowledge of their waterways with an unwavering commitment to the rights of their communities. Through its Climate and Safe Energy campaign, Waterkeeper Alliance engages in public advocacy, administrative proceedings and litigation aimed at reducing the water quality and climate change impacts of fossil fuel extraction, transport and combustion, including from BLM controlled lands, throughout the United States. Waterkeeper Alliance and our Waterkeeper groups have individual members, supporters and staff who have visited public lands in both New Mexico and Wyoming, including lands and waters that would be affected by actions under the challenged lease sale, for recreational, scientific, educational, and other purposes, who intend to continue to do so, and who are particularly interested in protecting these resources from water-intensive energy development.

The **Western Environmental Law Center ("WELC")** uses the power of the law to foster thriving, resilient western U.S. lands, waters, wildlife, and communities in the face of a changing climate. We envision a western U.S. abundant with protected and interconnected ecosystems, powered by renewable energy, and cared for by communities brought together in an ecology of kinship.

WildEarth Guardians ("Guardians") is dedicated to protecting and restoring the wildlife, wild places, wild rivers, and health of the American West. Guardians is a west-wide environmental advocacy organization with thousands of members, including members in Wyoming, New Mexico and surrounding states. Guardians' members live in and regularly use and enjoy lands in the Lease Sale areas, and are interested in their conservation.

The mission of the **Wyoming Outdoor Council ("WOC")** is to protect Wyoming's environment now and for future generations. We believe that public lands, wildlife, clean air and clean water are worth defending in Wyoming, Conservation should not be a partisan issue, and informed and engaged citizens make a difference.

STATEMENT OF REASONS IN SUPPORT OF COMMENTERS' PROTEST ON THE LEASE SALE

The above-named Commenters protest the BLM's proposed sale and all respective proposed parcels.[2] For reasons explained below, BLM must defer all parcels proposed for lease pending completion of programmatic review of the federal fossil fuel programs. Specifically, it must complete an analysis, under the National Environmental Policy Act of 1976 ("NEPA"), the Federal Land Policy and Management Act ("FLPMA"), the Endangered Species Act ("ESA"), and other laws and regulations, of those programs' cumulative greenhouse gas pollution, their associated climate impacts, and their compatibility with BLM's public-lands statutory mandates and the U.S. goal of limiting global warming to 1.5° Celsius. Importantly, that analysis is both legally required and has never been done. Each sold lease parcel would lock in more future greenhouse gas pollution at a time when it is imperative for the U.S. to reduce emissions. That pollution will worsen climate and extinction crises and their associated harm to people and the environment. Multiple studies show that there is simply no room left in the global carbon budget for new commitments of fossil fuel development. Already-producing oil and gas fields of the world, if fully developed, will by themselves push global warming past the 1.5° Celsius limit (not accounting for emissions from coal production). Thus, we again urge BLM, and by extension the Department of Interior, to exercise their full authority under federal law to end new federal fossil fuel leasing and enact a managed decline of production consistent with the U.S. goal of limiting global warming to 1.5° Celsius.

I. National Environmental Policy Act

A. BLM Must Prepare a Programmatic EIS to take a Hard Look at Federal Oil and Gas Leasing.

i. There Is a Small Remaining Window to Avoid the Most Catastrophic Effects of Climate Change and a Programmatic Review Is Necessary to Inform Future Action.

The science is clear: there is simply no room for continuation of a "business as usual" approach on the federal mineral estate if humanity is to have a meaningful chance of curtailing truly catastrophic warming. To maintain a coin flip chance of maintaining warming below 1.5°C, *global* fossil fuel production must decrease by approximately 6% per year between 2020 and 2030, and approximately 60% of global fluid mineral resources must be left in the ground.[3, 4] For developed nations, including the U.S., in order to maintain a 50% or better chance of avoiding 1.5°C of warming, "coal production needs to fall by 50% within five years and be effectively eliminated by 2030," while oil and gas production must be cut by 74% by 2030 and end by 2035.[5] To maintain a 67% chance of avoiding 1.5°C of warming, the U.S. must *end* oil and gas

[2] This protest is supplemental to and incorporates by reference: (1) Commenters' December 17, 2025, scoping comments and February 20, 2026 Draft EA comments on the New Mexico Q2 '26 sales, and (2) Commenters' November 17, 2025, scoping comments and January 22, 2026, Draft EA comments on the Wyoming Q2 '26 sales, as well as all the attachments and exhibits associated with both comment documents.
[3] **Exhibit 1,** SEI, IISD, ODI, E3G, and UNEP, *The Production Gap Report: 2020 Special Report* (2021).
[4] **Exhibit 2,** Welsby, D., Price, J., Pye, S. et al. *Unextractable fossil fuels in a 1.5 °C world*. Nature 597, 230–234 (2021) (if 60% of remaining oil and gas is left in situ, we will retain a 50% chance of limiting warming to 1.5°C).
[5] **Exhibit 3,** Calverley, D. and Anderson, K. (2022), *Phaseout pathways for fossil fuel production within Paris-compliant carbon budgets*. Tyndall Centre, University of Manchester.

production by 2031.[6] The latest reports only paint a grimmer picture of the rapidly shrinking opportunity to avert the worst consequences of climate change. It is clear that extreme weather events, and their human, ecological, and economic costs, are already harming, killing, and displacing millions of people around the world.[7] Instead of falling, greenhouse gas concentrations continue to rise, and modest reductions have done little to check their trajectory.[8] Without drastic action, "the physical and socioeconomic impacts of climate change will be devastating. Irreversible physical changes in the climate system, known as tipping points, cannot be ruled out and could have significant global and regional consequences."[9] International pledges are insufficient to avert catastrophic temperature increases and are woefully insufficient to constrain global temperature rise below 1.5°C.[10] Moreover, most nations that pledged reductions are nowhere near meeting those pledges.[11] In light of ongoing production, BLM must not lease any further parcels for development, as doing so jeopardizes meeting the 1.5° C target.[12]

A fundamental disconnect exists between the reality of climate change, and how public lands are managed for energy production. A recent paper calculates that lifecycle emissions from federal fossil fuel development resulted in an average of 1,408 million metric tons (MMT) of Carbon Dioxide-equivalent (CO2e) per year since 2005—the equivalent of 377 coal-fired power plants, or the emissions from 303 million cars—and are projected to be around 1,130 MMT CO2e by 2030.[13] These emissions will amount to around 20% of total U.S. greenhouse gas emissions each year.[14]

Most recently, at COP28, the parties to the Paris Agreement acknowledged the need for a just transition away from fossil fuel energy sources and a phase-out of fossil fuel subsidies.[15]

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[6] *Id*.
[7] **Exhibit 4,** The 2022 report of the *Lancet* Countdown on health and climate change: health at the mercy of fossil fuels. https://www.thelancet.com/journals/lancet/article/PIIS0140-6736(22)01540-9/fulltext
[8] **Exhibit 5,** World Meteorological Organization (2022). United in Science 2022 A multi-organization high-level compilation of the most recent science related to climate change, impacts and responses. https://library.wmo.int/doc_num.php?explnum_id=11309; **Exhibit 6,** United Nations Framework Convention on Climate Change (October 26, 2022), Nationally Determined Contributions Under the Paris Agreement: Synthesis Report by the Secretariat. https://unfccc.int/documents/619180.
[9] *Id.*
[10] **Exhibit 7,** United Nations Environment Programme (2022). Emissions Gap Report 2022: The Closing Window — Climate crisis calls for rapid transformation of societies. Nairobi. https://www.unep.org/emissions-gap-report-2022.
[11] *Id.*; United Nations Framework Convention on Climate Change (October 26, 2022), Nationally Determined Contributions Under the Paris Agreement: Synthesis Report by the Secretariat, https://unfccc.int/documents/619180, Exhibit 6.
[12] **Exhibit 8,** *Navigating Energy Transitions: Mapping the Road to 1.5° C*, Exhibit 11. Additional development also risks leaving stranded assets, as fields will need to be decommissioned before the end of their lifespan. *Id.*
[13] **Exhibit 9,** N. Ratledge et al., *Emissions from Fossil Fuels Produced on US Federal Lands and Waters Present Opportunities for Climate Mitigation*, 171 Climatic Change, no. 11, Mar. 14, 2022, at 2–5, https://link.springer.com/content/pdf/10.1007/s10584-021-03302-x.pdf.
[14] *Id*. at 6 fig. 2.
[15] *See* **Exhibit 10,** United Nations Framework on Climate Change (UNFCC), Conference of the Parties (COP28), First global Stocktake, Proposal by the President, Draft Decision (Dec. 13, 2023), at 5; *see also* **Exhibit 11,** UNFCC Conference of the Parties, Work Programme on Just Transition Pathways, Proposal By the President, Draft Decision (Dec. 13, 2023).

BLM's continued authorization of fossil fuel leasing and development is contrary to these international goals, and seriously undermines U.S. progress toward meeting them.

Similarly, the Intergovernmental Panel on Climate Change (IPCC) recently released the entirety of its sixth assessment report (AR6), including a synthesis of its findings.[16] The IPCC Sixth Assessment provided the remaining carbon budget from the beginning of 2020 as 400 $GtCO_2$ for a 67% probability of meeting the 1.5°C limit and 500 $GtCO_2$ for a 50% probability of 1.5°C.[17] At current emissions levels, the world will exceed the global carbon budget for a 50% chance of limiting warming to 1.5°C in just 10 years. The Sixth Assessment Report found that net anthropogenic greenhouse gas emissions during 2010 to 2019 were higher than any previous time in human history.[18] Nationally determined contributions (NDCs) make it likely that we will exceed 1.5°C this century. Policies implemented at the end of 2020 are projected to result in higher global GHG emissions than even those implied by NDCs. Projected CO_2 emissions over the lifetime of existing and planned fossil fuel infrastructure exceed the CO_2 emissions in pathways that limit warming to 1.5°C.[19] In pathways that limit warming to 1.5°C with no or limited overshoot, global GHG emissions peak between 2020 and 2025, and then fall to 48% below 2019 level by 2030, reaching net-zero by early 2050s. Without strengthening policies beyond those at present, GHG emissions are projected to rise beyond 2025, leading to global warming of 3.2°C by 2100.[20] Reducing GHG emissions across the energy sector requires substantial reduction in overall fossil fuel use and the deployment of low-emission energy sources. The continued installation of unabated fossil fuel infrastructure will 'lock-in' GHG emissions.[21]

As UN Secretary-General António Guterres stated upon the release of the Intergovernmental Panel on Climate Change's (IPCC) 2022 report:

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[16] **Exhibits 12** and **13**, IPCC, 2021: Summary for Policymakers and Technical Summary. **Exhibit 14,** In: Climate Change 2021: The Physical Science Basis. Contribution of Working Group I to the Sixth Assessment Report of the Intergovernmental Panel on Climate Change [Masson Delmotte et al. (eds.)]. Cambridge University Press, Cambridge, United Kingdom and New York, NY, USA, pp. 3−32, doi:10.1017/9781009157896.001; **Exhibit 15**, IPCC, 2022*: Climate Change 2022: Mitigation of Climate Change. Contribution of Working Group III to the Sixth Assessment Report of the Intergovernmental Panel on Climate Change* [P.R. Shukla et al. (eds.)]. Cambridge University Press, Cambridge, UK and New York, NY, USA. doi: 10.1017/9781009157926; **Exhibit 16**, IPCC, 2022: *Climate Change 2022: Impacts, Adaptation, and Vulnerability.* Contribution of Working Group II to the Sixth Assessment Report of the Intergovernmental Panel on Climate Change [H.-O. Pörtner et al.]. Cambridge University Press. In Press; **Exhibit 17,** IPCC 2023: *Synthesis Report of the IPCC Sixth Assessment Report* [Paola Arias et al. (eds.)], Cambridge University Press.

[17] Intergovernmental Panel on Climate Change, Summary for Policymakers In: Climate Change 2021: The Physical Science Basis. Contribution of Working Group I to the Sixth Assessment Report of the Intergovernmental Panel on Climate Change (2021), https://www.ipcc.ch/report/sixth-assessment-report-working-group-i/ at SPM-38, Exhibit 14.

[18] IPCC, 2022: Summary for Policymakers. In: Climate Change 2022: Mitigation of Climate Change. Contribution of Working Group III to the Sixth Assessment Report of the Intergovernmental Panel on Climate Change [P.R. Shukla, J. Skea, R. Slade, A. Al Khourdajie, R. van Diemen, D. McCollum, M. Pathak, S. Some, P. Vyas, R. Fradera, M. Belkacemi, A. Hasija, G. Lisboa, S. Luz, J. Malley, (eds.)]. Cambridge University Press, Cambridge, UK and New York, NY, USA. doi: 10.1017/9781009157926.001, at SPM-4, Exhibit 15.

[19] *Id.* at SPM-15, 16.

[20] *Id.* at SPM-21.

[21] *Id. at* SPM-36.

> Climate scientists warn that we are already perilously close to tipping points that could lead to cascading and irreversible climate impacts. But, high-emitting Governments and corporations are not just turning a blind eye, they are adding fuel to the flames. They are choking our planet, based on their vested interests and historic investments in fossil fuels, when cheaper, renewable solutions provide green jobs, energy security and greater price stability…. Climate activists are sometimes depicted as dangerous radicals. But, the truly dangerous radicals are the countries that are increasing the production of fossil fuels. Investing in new fossil fuels infrastructure is moral and economic madness. . ..[22]

BLM has yet to complete either a project or program-level NEPA document that analyzes the federal oil and gas program in light of these scientific conclusions and with an eye to developing alternatives that respond to them. A programmatic NEPA review is the ideal vehicle for such an analysis.

ii. BLM Must Prepare a Programmatic EIS to take a Hard Look at the Impacts of the Resumption of Federal Oil and Gas Leasing and to Avoid Any New Greenhouse Gas Pollution.

Current policy commitments indicate that Federal agencies intend to take imminent action that will significantly impact our ability to fight climate change. The administration's January 20, 2025 "Unleashing American Energy" Executive Order, attempted freeze of federal funding for climate mitigation, rollback of fuel economy standards, halting of all leasing of federal lands and waters for new wind farms, and targeting of electric vehicle rollout and tax credits are all evidence of this. The proposed 2026 lease sales thus are plainly part of a larger national initiative and must be analyzed in a Programmatic EIS.

BLM and Interior must therefore take a hard and comprehensive look at the cumulative climate change impacts of authorizing *any* new leasing when combined with committed emissions already under lease or permit, and immediately defer *any* sale of new leases and APD approvals pending demonstration of compatibility with global climate goals. The Department and BLM must conduct this analysis now, along with other relevant agencies that manage fossil fuel development on federal lands and waters, including BOEM. BLM must also consider, as proposed.in the Conservation Groups' scoping comments, a reasonable alternative of managed decline of GHG emissions from the approximately 13.5 million acres of fossil fuel estate already under lease but not producing.[23]

The climate crisis is fundamentally an incremental problem and the contribution of individual oil and gas development actions on the part of the BLM to climate change are difficult to assess, precisely because it is rare that such actions—taken in isolation—will be truly significant at a national or global scale. This is particularly true at the level of an individual lease sale, where the projected development of mineral resources on a given lease or set of leases will reduce the remaining global and national carbon budgets by vanishingly small fractions. Yet it is

[22] United Nations Secretary-General, António Guterres (UN Secretary-General) to the press conference launch of IPCC Report (February 28, 2022) (emphasis added), https://media.un.org/en/asset/k1x/k1xcijxjhp.
[23] *See* 2021 BLM Specialist Report at Table 4-11, Five-Year Federal Oil and Gas Statistics, recording nearly 25 million acres under lease for oil and gas with over 12.6 million acres producing.

this creeping normalcy that results in fossil fuel development on BLM administered lands being responsible for 15.3% of total U.S. GHG emissions, 1.8% of global emissions, and nearly 21% of all emissions in the U.S. from fossil fuel production.[24] With respect to carbon dioxide, emissions from fossil fuels produced on federal lands represent a quarter of *all* CO_2 emissions in the U.S.[25]

It is precisely because of this incrementally small but collectively mammoth impact on the climate crisis that BLM must prepare a programmatic EIS for the federal oil and gas program—prior to committing a single additional acre to fossil-fuel development.[26] Such a programmatic examination would dovetail with an EIS that collectively analyzes the proposed 2026 lease sales, discussed below. At the outset, however, Commenters stress that BLM should prepare a programmatic EIS for the entire federal oil and gas leasing program before holding another lease sale. The purpose of a programmatic EIS or other programmatic NEPA review is to:

> [A]ddress the general environmental issues relating to broad decisions, such as those establishing policies, plans, *programs*, or suite of projects, and can effectively frame the scope of subsequent site-and project-specific federal actions . . . [o]ne advantage of preparing a programmatic NEPA review *for repetitive agency activities* is that the programmatic NEPA review can provide a starting point for analyzing direct, indirect, and cumulative impacts.[27]

A programmatic approach is compelled for the following reasons: 1) the fundamentally incremental nature of the climate crisis; 2) the small and shrinking window that remains to avoid the most catastrophic effects of climate change, a reality that was not reflected in the Department's Report on the Federal Oil and Gas Leasing Program;[28] 3) the importance of completing an analysis BLM started with its issuance of the BLM Specialist Report and the Interior Report, by conducting a PEIS; and 4) the need for consistency with the pending federal coal review.

iii. BLM Must Complete the Analysis Begun in the Specialist Reports.

A programmatic review is particularly critical following the release of the BLM Specialist Reports and Interior Report. The former constitute—in large part—the quantification

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[24] 2021 BLM Specialist Report at Section 9.1 (Representative Concentration Pathways), ("Climate change is fundamentally a cumulative phenomenon, global in scope, and all GHGs contribute incrementally to climate change regardless of scale or origin."); Section 7.1. (BLM Share of 2020 Annual Global and U.S. GHG Emissions), Table 7-1.

[25] **Exhibit 18**, Merrill, M.D., Sleeter, B.M., Freeman, P.A., Liu, J., Warwick, P.D., and Reed, B.C., Federal lands greenhouse gas emissions and sequestration in the United States—Estimates for 2005–14: U.S. Geological Survey Scientific Investigations Report 2018–5131, 31 (2018).

[26] **Exhibit 19**, Members of petitioner groups made this point initially in their comments submitted in response to Executive Order 14008, with the title: WELC et al Recommendations for Scope and Criteria for Review of the Federal Fossil Fuel Programs**.** (April 16, 2021).

[27] **Exhibit 20,** Memorandum for Heads of Federal Departments and Agencies, *Effective Use of Programmatic NEPA Reviews*, Counsel on Environmental Quality, December 18, 2014 (emphasis added).

[28] **Exhibit 21,** *Report on the Federal Oil and Gas Leasing Program, Prepared in Response to Executive Order 14008* (November, 2021) (Hereinafter "Interior Report") (the Report focused entirely on necessary fiscal reforms but ignored climate).

and context of federal mineral estate-associated GHG emissions. BLM must now take the logical next step, by completing the programmatic NEPA analysis it has effectively begun with the BLM Specialist Report. It must also do what it failed to do in the Interior Report – qualitatively and quantitatively discuss the climate change impacts of these emissions in the context of the federal program, leased but as yet undeveloped federal lands, as well as national and global emissions. Failure to do so will represent a lost opportunity to meaningfully evaluate the outsized role the federal oil and gas leasing program plays in the climate crisis, and to explore alternatives to reduce its impacts through the federal oil and gas program.

BLM has, with the BLM Specialist Reports, fulfilled the lowest common denominator of quantifying federal emissions against the backdrop of federal laws and climate science. It must now meaningfully analyze those emissions in light of remaining national and global carbon budgets, and must apply tools such as the Social Cost of Greenhouse Gases to describe the actual economic, ecologic, and human costs of the program at national and global scales. The BLM Specialist Report briefly describes federal fossil fuel emissions in the context of various carbon budgeting mechanisms and global emissions commitments (such as under the Paris Agreement). However, more is required by NEPA, and it must be done at a programmatic level, as the quantification of GHGs in the BLM Specialist Report was done. Uncertainty about the United States' equitable share of the remaining carbon budget, or variability in carbon budgeting methods and social cost metrics does not justify a failure to analyze meaningful ways to address climate change and the oil and gas program's contributions to it.

The necessarily broad scale of an adequate analysis is indubitably best done once, and at the programmatic level, allowing the agency to tier to and place its subsequent, site-specific analyses within the context of the larger framework.[29] Thus while the BLM Specialist Report initiated this process, it has yet to be completed because BLM omitted a number of important considerations, including a meaningful analysis of fossil fuels currently committed to development under existing leases, a program-wide economic analysis of the climate costs of the oil and gas program, and a meaningful discussion about how BLM land management fits within the broader framework of global climate commitments and warming thresholds. In short, preparing a programmatic NEPA analysis will help the Agency to reduce or eliminate redundant and duplicative analyses and effectively address cumulative impacts, substantially reducing the administrative burden and economic costs to the Agency and assisting the Agency in formulating comprehensive mitigation measures that apply at the national level.

iv. A Programmatic EIS for the Federal Oil and Gas Program Is Consistent with The Department's Review of the Federal Coal Leasing Program.

A final factor weighing in favor of the completion of a programmatic EIS is the Federal Coal Program Review. Originally initiated in response to Secretarial Order 3338 (January 15, 2016), the intent was to prepare a programmatic EIS and review of the federal coal program designed to address a range of concerns, including but not limited to questions as to the fair return to American taxpayers from federal coal royalties, market fluctuations and resultant impacts to coal-dependent communities, and the more fundamental question of whether the leasing and production of federal coal is consistent with the Nation's domestic and international

[29] *See, Effective Use of Programmatic NEPA Reviews*, Exhibit 20.

goals to preserve a livable climate and meet international commitments to maintain global warming below certain critical thresholds, namely 1.5°C. Secretarial Order 3338 was rescinded by former Interior Secretary Ryan Zinke through Secretarial Order 3348, which also lifted the federal coal leasing pause that had been implemented by SO 3338. On August 20, 2021, the BLM issued a Federal Register notice in response to Secretarial Order 3398 (issued by Interior Secretary Deb Haaland), indicating its intent to reinstitute a federal coal program review and soliciting public comment. BLM received 214,866 comments in response to its request. The current status of the review itself is unknown. Until a programmatic NEPA review analyzing the climate, fiscal, and taxpayer impacts of all federal fossil fuel development occurs, no additional fossil fuel leasing should occur. BLM and Interior are compelled to do so by statutory mandates under FLPMA.

B. BLM Must Prepare an EIS to Address the Cumulative Impacts of All Lease Sales Proposed for 2026.

As discussed above, each of the proposed lease sales in 2026 is part of a larger national initiative to implement the federal administration's "Energy Dominance" agenda and must be analyzed as such under NEPA. That means preparing an analysis to address the cumulative impacts of the tens of millions of acres that may be leased both onshore and offshore, including not only those related to climate and greenhouse gases, but also wildlife habitat, water pollution, impacts to wildlife and recreation and other uses of these lands and waters, health and environmental justice, cultural resources, and other relevant issues. And as NEPA requires an agency to prepare an EIS for any major federal action that may significantly affect the quality of the human environment, 42 U.S.C. § 4332(2)(C), taking NEPA's requisite hard look at these impacts will require an EIS given the significance of leasing on such a scale.

C. BLM Has Failed to Consider a Reasonable Range of Alternatives.

i. BLM Must Consider a No-Leasing Alternative.

BLM's analysis of the no-leasing or no action alternative is incomplete and insufficient to adequately inform the public and the decision maker under statutory NEPA requirements. The impacts to GHG emissions and climate for the no action alternative (under which the parcels could not be leased) considered in the EA are brief and fail to indicate the difference in estimated GHG emissions between the proposed alternatives and the no action alternative.

Agencies should compare anticipated levels of GHG emissions from each alternative, including the no-action alternative, and mitigation actions to provide information to the public and enable the decision maker to make an informed decision. The no-action alternative should evaluate and discuss the cumulative effect of not leasing any of the 2026 parcels proposed for oil and gas development. This analysis should not only quantify the total GHG emissions that would be avoided as a result of not leasing but should also quantify and evaluate the co-benefits of not leasing, including the benefits of avoided air pollution, avoided water use, avoided produced water disposal, and the ability to put lands not leased to other beneficial uses.[30] The co-benefits analysis should also reflect the cumulative value of the renewable energy-generating capacity of

[30] Interior Report at 4, 12, Exhibit 21.

the federal lands and mineral estate that would be preserved under the no-action alternative. The impacts to GHG emissions and climate according to the no action alternatives considered must indicate the difference in estimated GHG emissions between the proposed alternatives and the no action alternatives.

ii. BLM Must Consider an Alternative That Considers Adopting a Policy of Managed Decline of Fossil Fuel Production from the Entire Federal Mineral Estate.

In our scoping comments, we requested that BLM include an alternative that considers adopting a policy of managed decline of fossil fuel production from the entire federal mineral estate. BLM does not discuss this alternative, let alone analyze it in detail. We urge the agency to offer more than a cursory explanation for its dismissal of this and other alternatives. In other recent BLM lease sale EAs in other states, BLM has often failed to discuss—and thus, seemingly failed to consider— this and other proposed alternatives at all. Inconsistencies among BLM offices in determining the alternatives to consider exemplify the need to consider the proposed lease sales in a single impact statement rather than through individual EAs. They also underscore the need for a programmatic review of the BLM fossil fuel program. We request BLM explain the basis for how and why it determines whether to consider proposed alternatives, and we request that BLM consider an alternative involving a policy of managed decline of fossil fuel production from the entire federal mineral estate.

iii. BLM Must Consider an Alternative That Protects Groundwater.

BLM must consider alternatives that would protect usable groundwater. Specifically, BLM should consider not leasing parcels within areas where there is less than 2,000 feet of vertical separation between the oil and gas formations likely to be targeted and any groundwater aquifer with 10,000 ppm TDS or less. BLM should also analyze an alternative whereby parcels would not be leased in areas overlying usable groundwater and surface water, and an alternative that includes other measures to ensure that all usable groundwater zones are protected. This might involve pre-leasing groundwater testing and adding a lease stipulation or lease notice requiring specified casing and cementing depths. Alternatively, or additionally, BLM should consider requiring a lease stipulation or lease notice requiring the lessee to perform groundwater testing prior to drilling to identify all usable water, and consultation with the U.S. Geological Survey and other agencies to identify those waters with up to 10,000 ppm TDS. BLM did not consider such an alternative.

iv. BLM Must Consider an Alternative that Minimizes Methane Waste Through both Technology and Regulatory Authority.

BLM must include in their analysis an alternative that applies a stipulation that mandates the use of best available methane reduction technologies to parcels. Research has demonstrated that the use of technically proven and commercially available methane emissions reduction technologies can together capture more than 80 percent of the methane currently going to waste in the oil and gas sector's operations. Such technologies include: green completions to capture oil and gas well emissions; plunger lift systems or other well de-liquification methods to mitigate gas well emissions; tri-ethylene glycol (TEG) dehydrator emission controls to capture emissions

from dehydrators; desiccant dehydrators to capture emissions from dehydrators; dry seal systems to reduce emissions from centrifugal compressor seals; improved compressor maintenance to reduce emissions from reciprocating compressors; low-bleed or no-bleed pneumatic controllers used to reduce emissions from control devices; pipeline maintenance and repair to reduce emissions from pipelines; vapor recovery units used to reduce emissions from storage tanks; and leak monitoring and repair to control fugitive emissions from valves, flanges, seals, connections and other equipment.

In addition to these best available methane reduction technologies, BLM must also consider an alternative that implements its legal obligation to use all reasonable precautions to prevent waste, including a stipulation on leases that provides for no routine venting or flaring, similar to regulations that are already being implemented in the states of Colorado and New Mexico. Although BLM has completed a rulemaking effort pursuant to its authority to prevent waste under 30 U.S.C. §§ 187, 225, BLM's final rule does not go nearly far enough to prevent waste from routine flaring on BLM managed leases on Tribal and federal public lands, and is slated for suspension, revision, or recission under the Interior's Sec. Order 3418. Until methane waste is adequately addressed, BLM should not be holding lease sales or issuing leases, much less granting applications for permits to drill. Failing this, however, BLM must, at a minimum, use its existing authority under Notice to Lessees 4a (Jan. 1, 1980) ("NTL-4A) and the Inflation Reduction Act to condition such leases as it does issue to limit the environmental and human health harms caused by routine venting and flaring and to safeguard Tribal and publicly held resources from unreasonable and undue waste. Interior's standard lease form, Form 3100-11 (October 2008) provides, in section 4, that a "[l]essee . . . must prevent unnecessary damage to, loss of, or waste of leased resources," and that Interior "reserves right to specify rates of development and production in the public interest . . .." Such an alternative must also articulate the implementation of existing methane waste policies as described in NTL-4A, and provide guidance requiring strict compliance with, at a minimum, NTL-4a's existing measures as well as BLM's legal authority and responsibility pursuant to the Federal Land Policy and Management Act to prevent or reduce methane emissions, independent of the agency's MLA duty to prevent waste. In addition, such an alternative could use the following mechanisms to prevent methane waste:

- Removal of a lease parcel from proposed sale or denial of an application for permit to drill if Interior determines that methane, nitrogen oxides, or other harmful emissions are impermissible, whether because such emissions would constitute waste or impair or cause undue or unnecessary harm to non-mineral public lands resources and values, in particular but not exclusively "air and atmospheric" values.
- Controlling the timing, location, and pace of new drilling as well as the rate of production of new or existing wells to eliminate methane or other harmful emissions to align new drilling and production with midstream system capacity.
- A requirement, whether via stipulation or condition of approval, that a lessee or operator, once flowback establishes the level of gas production, connect an oil well producing associated gas to a natural gas line with sufficient capacity prior to the commencement of full production.

- A menu of drilling-stage of conditions of approval specifying known and readily available practices or technologies typically employed to reduce methane waste in accord with the MLA or methane and other harmful emissions in accord with FLPMA.

Again, BLM attempts to defer a hard-look analysis of methane waste impacts, or consideration of alternatives that eliminate or mitigate those impacts, to the APD stage.

We also recommend that BLM consider in this alternative a stipulation limiting flaring to situations where it is infeasible or unsafe to capture the gas and not allowing routine flaring where there is simply inadequate pipeline capacity or timing issues. Similar approaches to flaring have been adopted through regulations by New Mexico and Colorado.[31]

v. BLM Must Consider an Alternative that Provides for Meaningful And Measurable Mitigation Actions in the Context of Cumulative Climate Change Resulting from Global Emissions

Under FLPMA, BLM has an array of responsibilities, implicated by the impacts of climate change, that it must consider when deciding whether to approve new oil and gas lease sales, including to:

- Protect public land values including air and atmospheric, water resource, ecological, environmental, and scenic values, and to preserve and protect "certain public lands in their natural condition," and "food and habitat for fish and wildlife." 43 U.S.C. §1701(a)(8);
- Account for "the long-term needs of future generations." 43 U.S.C. § 1702(c);
- Prevent "permanent impairment of the productivity of the land and quality of the environment." 43 U.S.C. § 1702(c);
- "[T]ake any action necessary to prevent unnecessary or undue degradation of the lands." 43 U.S.C. § 1732(b); and
- Manage public lands on the basis of multiple use and sustained yield. 43 U.S.C. § 1732(a).

To carry out these responsibilities in the context of oil and gas leasing, BLM has a corresponding array of authorities to address the impacts of oil and gas leasing and development. These authorities include choosing not to lease the federal mineral estate for oil and gas development, withdrawing federal minerals from leasing, prohibiting leasing in resource management plans and through resource management plan amendments, requiring conditions of approval in new authorizations of oil and gas leases, as well as managing the rate of oil and gas production in federal leases.

The Mineral Leasing Act (MLA) also authorizes BLM to reduce the rate production over a defined period of time, limiting the amount of extraction and greenhouse gas pollution that would result. The MLA authorizes the Secretary of the Interior to "alter or modify from time to

[31] *See, e.g.*, 2 Colo. Code Regs. § 404-1:903; N.M. Admin. Code § 19.15.27.8.

time the rate of prospecting and development and the quantity and rate of production under such a plan." 30 USCA § 226(m). Likewise, nearly all BLM leases for onshore oil and gas contain a clause which states that "Lessor reserves the right to specify rates of development and production in the public interest." *See* U.S. Department of the Interior, Offer to Lease and Lease for Oil and Gas, Form 3100-11 (Oct. 2008). According to these authorizations, the Secretary and BLM could set a declining rate of production over time that provides for an orderly phase-out of onshore fossil fuel production.

BLM's legal duty and authority provide a variety of mitigation actions BLM could take to meaningfully and measurably to address cumulative climate change resulting from global emissions. We request BLM perform its NEPA analyses in a way that correctly reflect its legal duties and authorities.

D. BLM Has Failed to Take a Hard Look at Reasonably Foreseeable Climate Consequences.

As described in a number of contexts below, BLM has failed to take the requisite "hard look" at the reasonably foreseeable environmental consequences of the proposed lease sale.

i. Federal Fossil Fuel Emissions Are Significant Under NEPA.

a) EPA GHG Equivalency Calculator

We request BLM contextualize the GHG emissions of the 2026 lease sales by using the EPA GHG equivalency calculator to consider the GHG emissions over the average 30-year production life of the leases. BLM evaluated GHG emissions estimated from the proposed lease sale and from the cumulative GHG emissions from BLM's onshore federal fossil fuel program using several analytical tools, all of which indicate federal fossil fuel emissions of GHGs are significant under NEPA. BLM used EPA's greenhouse gas equivalency calculator to express the estimated annual GHG emissions from the lease sale in terms of the GHG emissions produced from gas-fueled vehicles driven for one year, or the emissions that could be avoided by operating wind turbines as an alternative energy source or offset by the carbon sequestration of forest land. However, we request BLM contextualize the GHG emissions of the 2026 lease sales by using the EPA GHG equivalency calculator to consider the GHG emissions over the average 30-year production life of the leases. We also request BLM contextualize the cumulative GHG emissions from the federal fossil fuel program using EPA's GHG equivalency calculator. BLM cannot fulfill its NEPA obligations with this type of comparison, which artificially minimizes significance and tells the public nothing about the actual impacts of emissions.

b) Social Cost of Greenhouse Gases

BLM failed to use the social cost of greenhouse gases (SC-GHG) as a tool to assess GHG emissions and climate change effects from the proposed lease sale. The social cost of greenhouse gases provides an estimate of the monetized global damages associated with the incremental

increases of GHGs.[32] BLM should not only provide the SC-GHG, but also an analysis of the decision making pursuant to those numbers.

BLM did not use the social cost of GHGs tool to assess the impacts of the cumulative cost of global damages from BLM's fossil fuel program in the BLM Specialist Reports, and BLM failed to explain the basis for its decision to omit this analysis. We request BLM contextualize the cumulative GHG emissions from the federal fossil fuel program using the social cost of GHGs. The cumulative cost of the federal fossil fuel program is an important consideration for BLM to weigh, as it is many orders of magnitude greater than the already significant costs of just the proposed 2025 lease sales.

As discussed elsewhere in these comments, there *are* scientifically established standards and findings that can inform BLM's analysis; BLM *must* analyze the significance of new emissions and put them into context. The agency should use existing, accepted methodologies, tools, and information such as the social cost of greenhouse gases and carbon budgeting, and the findings of the IPCC in the recently released AR6, and develop a cumulative significance threshold for reasonably foreseeable greenhouse gas emissions from projects authorized by BLM.

Although the President's January 20, 2025, Executive Order directs agencies to rescind any social cost of carbon guidance issued by the Interagency Working Group, it does not absolve the Bureau of Land Management (BLM) of its duty under NEPA and APA to meaningfully analyze the GHG emissions associated with proposed projects. Even in the absence of a mandated social cost of carbon metric, BLM must still apply a methodology that adequately quantifies and contextualizes GHG emissions to satisfy its legal obligations under NEPA and the APA. The analysis herein regarding the requirements of an agency to rationally contextualize GHG emissions related to a project applies throughout this entire Comment.

c) Carbon Budgeting

BLM failed to use a tool to evaluate the impact of GHG emissions associated with BLM's onshore fossil fuel authorizations on the remaining atmospheric capacity to take on further GHG emissions without exceeding different degrees of additional warming. BLM improperly omitted carbon budget analysis of the United States' share of the global carbon budget. Nonetheless, GHG emissions from the onshore federal fossil fuel program consume a tremendous amount of the global budget – the "long term totals" from New Mexico Past, Present, and Reasonably 1.37% of the remaining global carbon budget of 380 $GtCO_2$ needed to limit global warming to 1.5 C. Importantly, scientists are increasingly able to show the significant impacts

[32] We urge BLM to apply the Social Cost of Greenhouse Gas values contained in EPA's September 2022 Report on the Social Cost of Greenhouse Gases: Estimates Incorporating Recent Scientific Advances. Due to their incorporation of recent scientific data, as well as reliance on lower discount rates, the EPA estimates represent a more accurate and up-to-date estimate of the costs of greenhouse gas production and consumption than the 2021 Interim Estimates of the Social Cost of Carbon, Methane, and Nitrous Oxide produced by the Interagency Working Group.

We request BLM evaluate and consider the impacts of climate change that have already occurred as a result of the cumulative emissions of GHGs. BLM's NEPA analysis of GHGs and climate change tends to frame the impacts of climate change as long-term impacts, estimated to be realized at some future point in time. However, the climate has already changed as a result of anthropogenic GHG emissions, and the consequences of global climate change are already being realized.

We further request that BLM consider, discuss, and evaluate the climate science regarding past and present impacts from climate change to further contextualize the climate impacts from the cumulative emissions of GHGs associated with the proposed lease sales and the federal fossil fuel program.

BLM's NEPA analyses of the proposed lease sales must acknowledge that anthropogenic GHG emissions over the past 60 years have resulted in impacts associated with the change in global climate. In fact, the 2021 BLM Specialist Report refers to the IPCC climate assessment report, which states: "Warming of the climate system is unequivocal, and since the 1950s, many of the observed changes are unprecedented over decades to millennia. The atmosphere and ocean have warmed, the amounts of snow and ice have diminished, sea level has risen, and the concentration of greenhouse gases have increased."[33] The IPCC AR6 report indicates that the globally averaged combined land and ocean surface temperature data, as calculated by a linear trend, show shows human caused warming of 1.07 ± 0.23°C over the period 1850 to 2019.[34] Warming of 1.07 C is over half the warming the 1.5 C of warming the U.S. has committed to avoid, and scientists are increasingly able to show the significant impacts of just 1.07 C of warming in terms of the intensification of wildfires, hurricanes, drought, and other weather-related phenomena.[35] We request BLM consider, discuss, and evaluate the climate science regarding past and present impacts from climate change to further contextualize the climate impacts from the cumulative emissions of GHGs associated with the proposed lease sales and the federal fossil fuel program.

ii. BLM Inadequately Analyzes the Global and National Over-Commitment of Fossil Fuels Relative to Global Carbon Budgets Necessary to Avoid 1.5°C Warming.

BLM's EA for the proposed lease sale omits analyzing and evaluating the estimated GHG emissions from the lease sale and cumulative GHG emissions within the context of the widening production gap, or the difference between global fossil fuel production projected by governments and fossil fuel production consistent with the 1.5 C-warming pathway and other

[33] 2022 BLM Specialist Report at Section 4.2, citing IPCC, 2023: Climate Change 2023.
[34] *Id.*
[35] Every extreme-weather attribution peer-reviewed study published to date is tracked and available at Carbon Brief, Mapped: How climate change affects extreme weather around the world, https://www.carbonbrief.org/mapped-how-climate-change-affects-extreme-weather-around-the-world (last visited Nov. 29, 2021); see also The Physical Science Basis. Contribution of Working Group I to the Sixth Assessment Report of the Intergovernmental Panel on Climate Change (2021), Exhibit 14; **Exhibit 22**, Swain, Daniel L. et al., Attributing Extreme Events to Climate Change: A New Frontier in a Warming World, One Earth (Jun. 2, 2020); **Exhibit 23**, Reed, Kevin A. et al., Forecasted Attribution of the Human Influence on Hurricane Florence, Science Advances 6 (1): eaaw9253, https://doi.org/10.1126/sciadv.aaw9253.

pathways.[36] The most recent UN Production Gap Report raises the alarm that despite the most recent IPCC findings, the world is running out of time to limit long-term global warming to 1.5°C as the world's governments continue to plan to produce more than double the amount of fossil fuels in 2030 than would be consistent with a 1.5°C-warming pathway.[37] We request BLM consider the United Nation production gap report discussed above, which indicates an imperative to rapidly transition away from fossil fuels using supply side policies.

BLM also failed to conduct an analysis of the monetized net harm to society associated with the cumulative increases in GHG emissions in the BLM Specialist Report. The BLM Specialist Report failed to analyze these cumulative impacts using the SC-GHG and failed to assess carbon budgets according to historic GHG contribution and equitable apportionment. In its social cost analysis of the cumulative GHG emissions attributable to all federal fossil fuel development and production, BLM should acknowledge that the Interagency Working Group (IWG) has consistently indicated that its Social Cost of Greenhouse Gas estimates represent an underestimation of the actual social costs associated with a given ton of GHG pollution. This fact has been borne out by the Environmental Protection Agency's November 2023 Report on the Social Cost of Greenhouse Gases: Estimates Incorporating Recent Scientific Advances, which reflects "recent advances in the scientific literature on climate change and its economic impacts and incorporate recommendations made by the National Academies of Science, Engineering, and Medicine." The fact that the EPA's social cost estimates, which are scientifically rigorous and reflect the best and most up-to-date scientific and economic data, are significantly higher than those of the IWG further illustrates the extent to which the IWG interim numbers may be considered an underestimate. Nonetheless, the IWG numbers represent the most current official estimate of social costs and therefore constitute an important starting point for BLM's analysis, which must include a discussion of the ways in which the IWG estimates are likely to undervalue future climate damages.

BLM's Specialist Report must also further contextualize its carbon budget analysis by evaluating carbon budgets according to the United States' historic contributions. It is well-documented that the United States is the world's largest historic contributor of GHG emissions and, thus, bears a greater global responsibility to more quickly reduce the quantity of its GHG emissions.[38] The BLM Specialist Report attempts to cast doubt on the utility of assessing GHG emissions according to carbon budgets, stating: "Carbon budgets have not yet been established on a national or subnational scale, primarily due to the lack of consensus on how to allocate the global budget to each nation, and as such the global budgets that limit warming to 1.5°C or 2.0°C are not useful for BLM decision-making as it is unclear what portion of the budget applies to emissions occurring in the United States, or how to account for BLM's authorized portion of projected U.S. emissions, and whether or not to account/deduct any fraction of federal minerals

[36] *See* **Exhibit 24,** SEI, Climate Analytics, E3G, IISD, and UNEP, *The Production Gap: Phasing down or phasing up? Top fossil fuel producers plan even more extraction despite climate promises,* Stockholm Environment Institute, Climate Analytics, E3G, International Institute for Sustainable Development and United Nations Environment Programme (2023), https://doi.org/10.51414/sei2023.050.
[37] *See id*.
[38] **Exhibit 25,** Evans, Simon, *Analysis: Which countries are historically responsible for climate change?* Carbon Brief, https://www.carbonbrief.org/analysis-which-countries-are-historically-responsible-for-climate-change (last visited Nov. 29, 2021).

that are consumed in other countries via exports."[39] However, uncertainty in other contexts of GHG and climate change analysis has not prevented BLM from using averages, estimates, and models to address uncertainty and provide the public and decision makers helpful information.[40] As such, BLM should consult the best scientific reports and data available to determine a representative carbon budget that reasonably applies to emissions in the United States, given its historic contributions.[41] The carbon budget analysis in the BLM Specialist Report, as currently drafted, is misleading because it inappropriately compares GHG emissions from the BLM federal fossil fuel program to the remaining global carbon budget. To the public or a decision maker, this analysis minimizes the GHG emissions from the BLM federal fossil fuel program and implies the emissions are insignificant to the global carbon budget, comparatively.

iii. The BLM Specialist Report Fails to Adequately Quantify and Assess All Related Past, Present, and Reasonably Foreseeable Future GHG Emissions and Climate Impacts.

The BLM failed to properly complete a cumulative impacts analysis of the proposed 2026 lease sales, including an assessment of the cumulative impact of greenhouse gas emissions from the federal fossil fuel program. BLM must assess the cumulative greenhouse gas emissions from recent and reasonably foreseeable federal offshore oil and gas lease sales. BLM must also assess the cumulative greenhouse gas emissions from recent and reasonably foreseeable federal fossil fuel lease sales and similar federal actions, including the emissions from pending coal lease applications. And BLM must assess cumulative greenhouse gas emissions from recent and reasonably foreseeable non-federal oil and gas leasing and development projects. For example, in 2022, 10 states held 45 lease sales, and in 2023, 10 states held 40 lease sales, selling tens of thousands of acres for oil and gas development.[42]

iv. BLM Must Take a Hard Look at Methane Emissions and Waste.

BLM must take a hard look at the impacts of methane, preferably in both a programmatic NEPA review, and an aggregated EIS for the proposed 2025 sales as discussed above. Methane is an incredibly potent greenhouse gas. Methane has contributed to approximately 30% of the global rise in temperatures to date. [43] Because of methane's potent short-term warming characteristics, curbing methane emissions is one of the most effective near-term ways to address the climate crisis. Methane emissions from fossil fuel operations represent nearly one-third of human-caused emissions.[44] These emissions represent both a major climate threat and also an

[39] 2022 BLM Specialist Report at Section 9.1.
[40] *See, e.g.,* 2021 BLM Specialist Report, Exhibit 16, at Section 3.4 (estimating global warming potentials), Section 4.0 (using various methods and assumptions to estimate emission factors for coal, oil, and gas and short- and long-term fossil fuel emissions projections), Sections 6.2–6.4 (projecting global and U.S. emissions).
[41] *See, e.g.,* **Exhibit 26**, Van den Berg, Nicole et al., *Implications of various effort-sharing approaches for national carbon budgets and emission pathways*, Climatic Change 162: 1805–1822 (2020), https://link.springer.com/article/10.1007%2Fs10584-019-02368-y; **Exhibit 27,** Dooley, Kate *et al*., *Ethical choices behind quantifications of fair contributions under the Paris Agreement*, Nature Climate Change 11: 300-305 (2021), available at https://www.nature.com/articles/s41558-021-01015-8.
[42] Past state oil and gas lease sale data available at https://www.energynet.com/page/Government_Sales_Results.
[43] **Exhibit 28**, IEA (2021) Michaels, K.C., de Oliveira, Tomás, *Curtailing Methane Emissions from Fossil Fuel Operations, Pathways to a 75% cut by 2030*, International Energy Agency.
[44] *Id.*

opportunity. Slowing and ultimately halting fossil fuel demand will not by itself achieve needed GHG cuts, particularly in the near-term. This means that curbing wasteful methane emissions from oil and gas production are an essential element of reducing climate-warming emissions.[45]

In 2019, oil and gas operators vented or flared approximately 150 billion cubic feet of methane, resulting in the loss of over $50 million in federal royalty revenue. This is enough natural gas to meet the needs of 2.1 million households, which is nearly as many households as the states of New Mexico, North Dakota, Utah and Wyoming combined. This waste also means lost royalty revenues for taxpayers and Tribes. A recent analysis conducted by Synapse Energy Economics calculated natural gas methane emissions volumes from venting, flaring, and leaks in the production segment on federal and Tribal lands and determined the value of that lost gas in the form of (1) lost royalties, (2) lost state revenue from taxes, and (3) lost revenue from wasted natural gas that could be used for other purposes. It found that $63.3 million in royalties, $18.8 million in state revenue from taxes (from the top six states), and $509 million in gas value was lost due to venting, flaring, and leaks on federal and Tribal lands.[46] The report found that, in 2019, leaks accounted for 46% and flaring for 54% of lost gas.[47] This report also found that the six states with the highest volumes of gas lost from federal and Tribal lands are New Mexico, North Dakota, Wyoming, Utah, Pennsylvania, and Colorado.[48] The problem of flaring is particularly pernicious in North Dakota, which accounts for the vast majority of gas lost from flaring on federal and Tribal land and has the highest flaring intensity of any state in the U.S.[49]

Furthermore, further could worsen existing and disparate impacts to human health. According to a study conducted by HEI Energy in New Mexico, for example, samples show high levels of methane, ethane and other volatile organic compounds, indicating that the ozone comes from oil and gas production.[50] At a national level, such waste on federal and Tribal lands already has significant and disproportionate health and other impacts on minority and low-income communities, including Indigenous communities.[51] On federal and Tribal lands in the U.S., there

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[45] *Id. See also* **Exhibit 29,** *The Imperative of Cutting Methane from Fossil Fuels*, International Energy Agency (Oct. 11, 2023), https://iea.blob.core.windows.net/assets/9efb310e-94d7-4c46-817b-9493fe5abb0a/Theimperativeofcuttingmethanefromfossilfuels.pdf.

[46] **Exhibit 30,** Olivia Griot et al., Onshore Natural Gas Operations on Federal and Tribal Lands in the United States: Analysis of Emissions and Lost Revenue, Synapse Energy Economics Inc., 3 (Jan. 20, 2023), https://blogs.edf.org/energyexchange/files/2023/01/EMBARGOED_EDF-TCS_Public_Lands_Analysis.pdf (hereinafter "Synapse").

[47] *Id.* at 23.

[48] *Id.* at 24.

[49] *Id.*; **Exhibit 31**, Rystad Energy, *Cost of Flaring Abatement: Final Report* 6 (Jan. 31, 2022), https://blogs.edf.org/energyexchange/files/2022/02/Attachment-W-Rystad-Energy-Report_-Cost-of-Flaring-Abatement.pdf (hereinafter "Rystad Report").

[50] *See* Jerry Redfern, *In This Tiny New Mexico Town, the Air Quality Is Worse Than in Downtown L.A*, Capital and Main (August 20, 2024), available at https://capitalandmain.com/in-this-tiny-new-mexico-town-the-air-quality-is-worse-than-in-downtown-l-a.

[51] **Exhibit 32** Jeremy Proville et al., *The demographic characteristics of populations living near oil and gas wells in the USA*, 44 Population and Environment 1 (2022), https://doi.org/10.1007/s11111-022-00403-2 (hereinafter "Proville, *The demographic characteristics*"); **Exhibit 33**, Cushing et al., *Up in Smoke: Characterizing the Population Exposed to Flaring From Unconventional Oil and Gas Development in the Contiguous U.S.*, 16 Environmental Research Letters 1, 1 (2021).; **Exhibit 34,** Caron-Beaudoin, *VOCs in indoor air and tap water samples*; **Exhibit 35**, Jill Johnston et al., *Environmental Justice Dimensions of Oil and Gas Flaring in South Texas: Disproportionate Exposure among Hispanic Communities*, Environ. Sci. Technol. (2020); **Exhibit 36**, Lara J.

are roughly 12,000 people living within a half mile of a well with flaring. This includes approximately 1,000 children under the age of five, more than 1,600 older Americans over the age of 65, 1,800 people living in poverty, and almost 6,000 people of color.[52] These groups live near flaring wells at much higher rates when compared to the nation at large. For example, Native Americans are 25% more likely to live within one mile of wells compared to the populations in the counties studied, while nationally they represent less than 2% of the country. [53] This proximity to oil and gas infrastructure creates disproportionate adverse health risks and impacts on Indigenous communities.[54] Moreover, the Indigenous people living on these lands are more likely to be living in poverty compared to the population of the encompassing state(s), which exacerbates the already disparate health burdens faced by these individuals and communities.[55] Waste from flared gas in particular has disparate health impacts on Indigenous people and other overburdened communities. Studies have found that "flaring is an environmental justice issue."[56] The majority of lost gas on Tribal lands is flared.[57]

Flaring has significant health impacts, and those impacts are clearly in communities near oil and gas infrastructure. A recent study found that a 1% increase in flared natural gas in North Dakota increases the respiratory-related hospitalization rate by 0.73%, for example.[58] Such effects are clearly documented in communities living near oil and gas infrastructure. According to an Environmental Defense Fund (EDF) analysis, roughly 1,100 adults with asthma, 800 adults with chronic obstructive pulmonary disease, 700 adults with coronary heart disease, and 400 adults who have experienced a stroke live within a half mile of a flaring well.[59] Another study links flaring to shorter gestation and reduced fetal growth.[60] Indigenous communities bearing the

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Cushing et al., *Flaring from Unconventional Oil and Gas Development and Birth Outcomes in the Eagle Ford Shale in South Texas*, 128 ENVIRONMENTAL HEALTH PERSPECTIVES , 077003 (2020).

[52] This data was compiled by analysts at Environmental Defense Fund (EDF). EDF used Enverus data to identify wells with reported flaring in 2019 for Texas, New Mexico, Colorado, North Dakota, Montana, Wyoming, and Mississippi. EDF then used GIS spatial files from BLM (oil and gas leases), U.S. Forest Service (mineral rights), and Bureau of Indian Affairs (surface ownership) to extract just those wells on federal and Tribal lands. (As there is not a comprehensive databased of tribal mineral ownership, surface ownership was used as a proxy for determining wells on tribal lands.) By identifying wells with flaring, we are also able to identify the local communities that are impacted by the air pollution from these wells. Using the methodology described in Proville, *The demographic characteristics*, Exhibit 53, U.S. Census Bureau's American Community Survey 5-year estimates for 2015–2019, and health data from the Centers for Disease Control and Prevention's Places dataset, we were able to estimate the populations living within a half mile radius of the previously identified wells using areal apportionment. *See* Centers for Disease Control and Prevention, PLACES: Local Data for Better Health, https://www.cdc.gov/places/index.html (last visited Jan. 30, 2023).

[53] Proville, *The demographic characteristics* at 10, Exhibit 32.

[54] *See, e.g.*, **Exhibit 37,** Clean Air Task Force, *Tribal Communities at Risk: The Disproportionate Impacts of Oil and Gas Air Pollution on Tribal Air Quality* 3, 2–5 (2018), https://www.catf.us/resource/tribal-communities-at-risk/.

[55] *Id*. at 4.

[56] Lara J. Cushing, et al., *Up in Smoke* at 7, Exhibit 33; *see* **Exhibit 38,** Wesley Blundell & Anatolii Kokoza, *Natural gas flaring, respiratory health, and distributional effect*, 208 Journal of Public Economics 104601, at 4, 10 (2022), https://doi.org/10.1016/j.jpubeco.2022.104601 (hereinafter "Blundell, *Natural gas flaring, respiratory health*").

[57] *Synapse* at 27, Exhibit 30.

[58] Blundell, *Natural gas flaring, respiratory health* at 1, Exhibit 38.

[59] *See supra* footnote discussing data compiled by analysts at Environmental Defense Fund (EDF).

[60] Cushing South Texas study at 077003-1, Exhibit 36.

brunt of excessive flaring therefore face significant adverse health impacts. Reducing waste from flaring on federal and Tribal lands would lessen these harms.

BLM failed to take a hard look at the direct, indirect, and cumulative methane emissions that will result from development of these leases and their commensurate impacts in accordance with NEPA. This includes Interior's duty to quantify methane emissions and, on that basis, to assess impacts and a range of reasonable alternatives and mitigation measures to cut those emissions. BLM must failed to consider the other environmental impacts of this wasted resource, including the public health and welfare impacts of flaring.[61]

v. BLM Must Consider Flaring and its Impacts in the EA.

BLM is well-aware that flaring results in waste of federal and tribal minerals, loss of revenue, and social and environmental impacts. Yet, BLM has repeatedly ignored flaring in its NEPA analyses for oil and gas lease sales. We urge BLM to correct this deficiency and consider flaring and its impacts in the EA for this lease sale. BLM must:

- Consider the direct, indirect, and cumulative socioeconomic impacts of flaring. A recent analysis conducted by Synapse Energy Economics calculated natural gas methane emissions volumes from venting, flaring, and leaks in the production segment on federal and tribal lands and determined the value of that lost gas in the form of (1) lost royalties, (2) lost state revenue from taxes, and (3) lost revenue from wasted natural gas that could be used for other purposes.
- Consider the direct, indirect, and cumulative human health impacts of flaring. For example, a recent study found that a 1% increase in flared natural gas in North Dakota increases the respiratory-related hospitalization rate by 0.73%.[62] BLM must examine how flaring affects people living in the region.
- Consider the direct, indirect, and cumulative environmental justice impacts of flaring, as well as means of mitigating any adverse effects.

E. BLM Must Take a Hard Look at Impacts to Human Health.

BLM must include an analysis of reasonably foreseeable human health impacts resulting from oil and gas leasing and development, including issues related to health and safety risks and impacts.

i. Overview of Human Health Impacts and Sources of Peer-Reviewed Literature Related to Proximity to Oil and Gas Development.

An extensive and ever-growing body of peer-reviewed research has shown what people living near oil and gas operations already know firsthand—that proximity to drilling and fracking

[61] **Exhibit 39**, EDF, Flaring Aerial Survey Results (2021), *available at* https://www.permianmap.org/flaring-emissions/; *see also* **Exhibit 40**, Gvakharia et al., *Methane, Black Carbon, and Ethane Emissions from Natural Gas Flares in the Bakken Shale,North Dakota*, Environmental Science & Technology 5317, 5317 (2017); Cushing et al., *Up in Smoke*, Exhibit 33.
[62] Blundell, *Natural gas flaring, respiratory health* at 1, Exhibit 38.

operations and other oil and gas facilities is linked to adverse health risks and impacts. These risks and impacts are discussed in further detail throughout this section, and in the numerous accompanying exhibits, but in general, they include (but are not limited to):

- Reproductive harms – including birth defects, low birth weight, preterm births, and miscarriages;
- Respiratory health effects – including asthma, lung disease, breathing difficulty, and, most recently, increased vulnerability to COVID-19;
- Eye, skin, and throat irritation and rashes;
- Cardiovascular effects – including higher blood pressure and other indicators of, or precursors to, heart disease;
- Possible disruption of the endocrine system (a system of glands producing hormones that regulate a variety of functions in the body, including metabolism, growth and development, reproduction, sleep, and mood);
- Cancer (lung cancer and other types of cancer);
- Motor vehicle injuries and fatalities, and other health and safety risks associated with increased vehicle traffic (and the air pollutants it emits) from oil and gas development;
- Injuries and fatalities from explosions, fires, spills, and leaks; and
- Trauma and psychological stress.

One excellent, frequently updated, and easy-to-use resource for keeping up with this growing body of peer-reviewed research is the Physicians, Scientists, and Engineers for Healthy Energy ("PSE Healthy Energy") database, the Repository for Oil and Gas Energy Research, or "ROGER."[63] ROGER is an extensive repository of peer-reviewed literature, "a near-exhaustive collection of bibliographic information, abstracts, and links to many of [sic] journal articles that pertain to shale and tight gas development."[64] This database is organized into several categories, and for the "Health" category alone, there are over 260 studies listed, including several recent studies from 2019-2022. BLM should avail itself of this invaluable resource in order to take NEPA's requisite hard look at health impacts.

There are several other notable scientific papers BLM should consider in order to analyze and disclose to the public the health risks and impacts associated with its leasing decisions.[65]

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[63] *See* Physicians, Scientists, and Engineers for Healthy Energy ("PSE Healthy Energy"), "The ROGER Citation Database," https://www.psehealthyenergy.org/our-work/shale-gas-research-library/ (last visited November 4, 2022).
[64] *Id.*
[65] *See, e.g.,* **Exhibit 41**, R.Z. Witter, et al., *Occupational exposures in the oil and gas extraction industry: state of the science and research recommendations*, AMERICAN JOURNAL OF INDUSTRIAL MEDICINE (2014); **Exhibit 42**, Jessica Gilman, et al., *Source signature of volatile organic compounds (VOCs) from oil and natural gas operations in northeastern Colorado*, ENVIRONMENTAL SCIENCE & TECHNOLOGY (2013); **Exhibit 43**, Roxana Z. Witter, et al., *The Use of Health Impact Assessment for a Community Undergoing Natural Gas Development,* FRAMING HEALTH MATTERS (2013); **Exhibit 44**, Nadia Steinzor, et al., *Investigating links between shale gas development and health impacts through a community survey project in Pennsylvania*, NEW SOLUTIONS, vol. 23 iss. 1. (2013); **Exhibit 45**, John L. Adgate, et al., *Potential Public Health Hazards, Exposures and Health Effects from Unconventional Natural Gas Development*, ENVIRONMENTAL SCIENCE & TECHNOLOGY (2014); **Exhibit 46**, Christopher W. Moore, et al., *Air*

Multiple peer-reviewed papers have identified adverse health effects and risks arising from exposure to unconventional oil and gas drilling operations, even within a large radius of residences—potentially up to ten miles.[66] For example, one study found that babies whose parents lived in close proximity to multiple oil and gas wells were 30% more likely to be born with heart defects than babies born to parents who did not live close to oil and gas wells.[67] Other adverse health impacts documented among residents living near drilling and fracking operations include increased reproductive harms, asthma attacks, higher rates of hospitalization, ambulance runs, emergency room visits, self-reported respiratory problems and rashes, motor vehicle fatalities, trauma, and drug abuse. Moreover, one recent study found that fracking and drilling near people's homes "drives stress experiences that go beyond the mere presence of industrial land uses in neighborhoods," and identified two key institutional barriers driving negative mental health impacts for people living near UOG [unconventional oil and gas] production – namely: 1) uncertainty, due to inaccessible, transparent information about environmental and public health risks and 2) powerlessness to meaningfully impact regulatory or zoning processes.[68]

Impacts of Increased Natural Gas Acquisition, Processing, and Use: A Critical Review, ENVIRONMENTAL SCIENCE & TECHNOLOGY (2014); **Exhibit 47**, Avner Vengosh, et al., *The effects of shale gas exploration and hydraulic fracturing on the quality of water resources in the United States*, PROCEDIA EARTH AND PLANETARY SCIENCE (2014); **Exhibit 48**, Christopher D. Kassotis, et al., Estrogen and Androgen Receptor Activities of Hydraulic Fracturing Chemicals and Surface and Ground Water in a Drilling-Dense Region, ENDOCRINOLOGY (2014); **Exhibit 49**, Brian E. Fontenot, et al., *An Evaluation of Water Quality in Private Drinking Water Wells Near Natural Gas Extraction Sites in the Barnett Shale Formation*, ENVIRONMENTAL SCIENCE & TECHNOLOGY (2013); **Exhibit 50**, Sherilyn A. Gross, et al., *Analysis of BTEX Groundwater Concentrations from Surface Spills Associated with Hydraulic Fracturing Operations*, JOURNAL OF THE AIR & WASTE MANAGEMENT ASSOCIATION (2013); **Exhibit 51**, K.D. Retzer, *et al., Motor vehicle fatalities among oil and gas extraction workers,* ACCIDENT ANALYSIS & PREVENTION (2013); **Exhibit 52,** Gayathri Vaidyanathan, *Fracking Can Contaminate Drinking Water*, Climate Wire (April 4, 2016), available at: https://www.scientificamerican.com/article/fracking-can-contaminate-drinking-water/; **Exhibit 53**, A. Tustin, et al., *Associations Between Unconventional Natural Gas Development and Nasal and Sinus, Migraine Headache, and Fatigue Symptoms in Pennsylvania,* ENVIRONMENTAL HEALTH PERSPECTIVES (July 31, 2016), available at: https://www.ncbi.nlm.nih.gov/pmc/articles/PMC5289909/.

[66] *See, e.g.,* **Exhibit 54**, Lisa M. McKenzie *et al.*, *Birth Outcomes and Maternal Resident Proximity to Natural Gas Development in Rural Colorado*, 122 ENVIRONMENTAL HEALTH PERSPECTIVES 412 (April 2014) [Hereinafter McKenzie et al., *Birth Outcomes*) (Finding an increased risk of congenital heart and neural tube defects in babies born to mothers living within 10 miles of a natural gas well); **Exhibit 55**, Janet Currie *et al., Hydraulic Fracturing and Infant Health: New Evidence from Pennsylvania*, 3 SCIENCE ADVANCES e1603021(Dec. 13, 2017) (Finding evidence of negative health effects of in utero exposure to fracking sites within 3 km, or about 1.86 miles, of a mother's residence, with the largest health impacts seen within 1 km, or about 0.62 miles); **Exhibit 56**, Ellen Webb *et al., Potential Hazards of Air Pollutant Emission from Unconventional Oil and Natural Gas Operations on the Respiratory Health of Children and Infants*, 31 REV. ENVIRONMENTAL HEALTH 225–243 (Jun. 1, 2016), at 236 [hereinafter Webb et al.] (Noting that many unconventional oil and gas setback rules, for setbacks of 1000 feet or less, do not adequately protect health, especially children's respiratory health, that "the majority of municipal setback ordinances are not supported by empirical data," and calling for a one-mile minimum for setbacks between drilling facilities and schools, hospitals, and occupied dwellings).

[67] *See* McKenzie *et al.*, *Birth Outcomes*, *supra* Exhibit 54.

[68] *See* **Exhibit 57,** Stephanie A. Malin, *Depressed democracy, environmental injustice: Exploring the negative mental health implications of unconventional oil and gas production in the United States*, 70 Energy Research & Social Science, 101720 at 2 (2020).

In turn, "these institutional barriers make UOG production a chronic stressor – which can be more insidious, negative, and, significantly, can generate longer- term mental health impacts such as self-reported depression."[69]

A 2023 review of literature on health impacts of fracking by Physicians for Social Responsibility ("PSR") concluded that:

> In sum, the vast body of scientific studies now published on hydraulic fracturing in the peer-reviewed scientific literature confirms that the climate and public health risks from fracking are real and the range of environmental harms wide. **Our examination uncovered no evidence that fracking can be practiced in a manner that does not threaten human health directly or without imperiling climate stability upon which human health depends.**
>
> The rapidly expanding body of evidence compiled here is massive, troubling, and cries out for decisive action. Across a wide range of parameters, the data continue to reveal a plethora of recurring problems that cannot be sufficiently averted through regulatory frameworks. The risks and harms of fracking are inherent in its operation. The only method of mitigating its grave threats to public health and the climate is a complete and comprehensive ban on fracking. Indeed, a fracking phase-out is a requirement of any meaningful plan to prevent catastrophic climate change.[70]

"No Surface Occupancy" (NSO) stipulations could be implemented within a certain distance of residences, schools, or other occupied areas that might mitigate some of these effects, but they do not eliminate BLM's obligation to take a hard look at health effects at the leasing stage, as NEPA requires. Stipulations and notices are used to comply with FLPMA and the MLA, and are not a substitute for a NEPA analysis. *See, e.g.,* 43 C.F.R. § 3101.1–3; 43 U.S.C. § 1732(a). Moreover, most existing oil and gas setbacks or NSO stipulations (typically < 1000 feet) are likely inadequate to protect people and communities against health and safety risks and adverse effects. At minimum, some health experts have called for a one-mile minimum distance between drilling facilities and schools, hospitals, and occupied dwellings, in light of the heightened health risks of residing within close proximity to unconventional oil and gas drilling sites.[71] Many others call for setbacks of even greater distances. One study found adverse health impacts at distances of six miles.[72] Another study found increased risk of congenital heart and neural tube defects in babies born to mothers living within 10 miles of natural gas wells.[73] Even larger setbacks may not protect against certain health hazards, especially for people already facing disproportionate health risks due to cumulative social, structural, and environmental

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[69] *Id*.
[70] **Exhibit 58,** Physicians for Social Responsibility and Concerned Health Professionals of NY, Compendium of Scientific, Medical, and Media Findings Demonstrating Risks and Harms of Fracking, 9th Edition (2023). [Hereinafter PSR 2023].
[71] *See* Webb *et al*., *supra* Exhibit 56.
[72] **Exhibit 59**, Kathy V. Tran et al., Residential Proximity to Oil and Gas Development and Birth Outcomes in California: A Retrospective *Cohort Study of 2006–2015 Births*, 128 Environmental Health Perspectives, 067001 (2020).
[73] Mckenzie et al., *Birth Outcomes*, *supra*, Exhibit 54.

factors, or for children and the elderly. For example, a 2016 study and Health Impact Assessment ("HIA") in Maryland's Marcellus Shale Basin found that, even with a setback of 2000 feet from residential property as a "mitigating factor," Air Quality was a fracking-related hazard of High concern for its potential negative health impacts after taking into account additional evaluation criteria, such as presence of vulnerable populations, duration and frequency of exposure, and likelihood and severity/magnitude of health effects.[74] BLM must take a hard look at the adverse health risks and effects associated with proximity to oil and gas activity and facilities and disclose them to the public.

ii. Cumulative Health Risks and Impacts to Social and Structural Factors Affecting Health.

BLM must take a hard look not only at direct health impacts and proximity-related health impacts of oil and gas development, but also at cumulative health risks and impacts. Cumulative health risks and impacts can arise not only from multiple pollutant exposures, and cumulative pollution exposures over time, but also from compounding structural, social, and economic factors, many of which are rooted in systemic inequities and injustices. Researchers have begun to apply a growing body of evidence documenting how social and environmental stressors lead

[74] *See, e.g.*, **Exhibit 60**, *Meleah* D. Boyle et al., Hazard Ranking Methodology for Assessing Health Impacts of Unconventional Natural Gas Development and Production: The Maryland Case Study, 11 PLOS ONE e0145368 (Jan. 4, 2016) [Hereinafter Boyle et al.](Assigning setback effectiveness a "positive" value of 1 if it is anticipated to minimize health effects, and a "negative" value of 2 if it is not anticipated to minimize health effects, in evaluating the "hazard rankings" for a variety of unconventional natural gas drilling impacts. Notably, there is no "zero" value by which setbacks eliminate health risks or health effects. And, for effects related to water quality, seismic activity, social determinants of health, healthcare infrastructure, cumulative exposures/risks, and occupational health and safety, the authors determined that, at least in that study area (Marcellus Shale in Maryland), setbacks were not anticipated to minimize or mitigate health risks at all. *See* Table 3).

to health inequities and cumulative impacts[75] specifically in the oil and gas drilling context.[76] For example, the aforementioned 2016 Marcellus Shale study and Health Impact Assessment ("HIA") ranked "social determinants of health," (in this study, social determinants included crime, injuries, mental health, sexually transmitted infections, and substance abuse) as a fracking-related hazard of the highest concern with respect to public health impacts, along with air quality and health care infrastructure.[77] Cumulative risks, too, were considered their own category of fracking-related public health hazard, and ranked as a "moderately high" concern (along with water quality, noise, and traffic).[78]

In general, the research indicates that the potential cumulative effects of social and environmental stressors and "social determinants of health" in the context of oil and natural gas activity are as follows: (1) they can increase the *risk or magnitude of exposure* and the *number and/or severity of adverse health impacts* of oil and gas drilling (e.g. pollution sources are often located closer to "environmental justice" communities; underlying health conditions can increase vulnerability to pollution-related health impacts; and pollution-related risks and impacts can exacerbate existing health, social, and economic stressors and vice versa); and (2) they can

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[75] *See, e.g.,* **Exhibit 61**, Rachel Morello-Frosch et al., *Understanding the Cumulative Impacts of Inequalities in Environmental Health: Implications for Policy*, 30 HEALTH AFFAIRS 879 (May 2011) (Identifying four key concepts underlying the emerging knowledge about cumulative impacts of environmental and social stressors: "First, health disparities between groups of different racial or ethnic makeup or socioeconomic status are significant and persistent, and exist for diseases that are linked to social and environmental factors. Second, inequalities in exposures to environmental hazards are also significant and persistent, and are linked to adverse health outcomes. Third, intrinsic biological and physiological factors—for example, age—can modify the effects of environmental factors and contribute to differences in the frequency and severity of environmentally related disease. And fourth, extrinsic social vulnerability factors at the individual and community levels—such as race, sex, and socioeconomic status—may amplify the adverse effects of environmental hazards and can contribute to health disparities."). In addition, the U.S. EPA and numerous states have called for, and developed guidance on, cumulative impact analyses, including cumulative risk assessments and health impact assessments (HIAs), that analyze multiple environmental stressors in conjunction with social stressors, environmental justice considerations, and social determinants of health. *See, e.g.*, **Exhibit 62**, U.S. ENVIRONMENTAL PROTECTION AGENCY, FRAMEWORK FOR CUMULATIVE RISK ASSESSMENT (May), *Available at* https://www.epa.gov/sites/production/files/2014-11/documents/frmwrk_cum_risk_assmnt.pdf; **Exhibit 63**, MINNESOTA POLLUTION CONTROL AGENCY, CUMULATIVE IMPACT ANALYSIS *Available at* https://www.pca.state.mn.us/air/cumulative-impact-analysis (Noting that "People's health is affected by many outside factors including multiple sources of pollution and other social conditions and stressors. Some people and communities are burdened by higher levels of pollution and more social stressors than others."; **Exhibit 64**, CUMULATIVE IMPACTS SUBCOMMITTEE, ENVIRONMENTAL JUSTICE ADVISORY COUNCIL TO THE NEW JERSEY DEPARTMENT OF ENVIRONMENTAL PROTECTION, STRATEGIES FOR ADDRESSING CUMULATIVE IMPACTS IN ENVIRONMENTAL JUSTICE COMMUNITIES (March 2009), *Available at* https://www.nj.gov/dep/ej/docs/ejac_impacts_report200903.pdf (Identifying adverse cumulative impacts of exposures to multiple environmental burdens in "environmental justice" communities as one of "the most critical and pertinent Environmental Justice issues requiring state action and attention").

[76] *See, e.g.,* **Exhibit 65**, Susan Kinnear et al., *The Need to Measure and Manage the Cumulative Impacts of Resource Development on Public Health: An Australian Perspective* (May 15, 2013). Available at https://www.intechopen.com/books/current-topics-in-public-health/the-need-to-measure-and-manage-the-cumulative-impacts-of-resource-development-on-public-health-an-au (https://www.intechopen.com/books/current-topics-in-public-health/the-need-to-measure-and-manage-the-cumulative-impacts-of-resource-development-on-public-health-an-au; *See also* **Exhibit 66**, Jill Johnston & Lara Cushing, *Chemical Exposures, Health, and Environmental Justice in Communities Living on the Fenceline of Industry*, 7 CURRENT ENVIRONMENTAL HEALTH REPORTS, 48–57 (2020).

[77] Meleah et al., Exhibit 60.

[78] Meleah et al., Exhibit 60.

present obstacles to diagnosing, managing, treating, and mitigating adverse health impacts (e.g. lack of access to health care providers makes it more difficult to manage asthma). BLM must take a hard look at the reasonably foreseeable cumulative health impacts of its actions, including cumulative impacts as they relate to social and structural factors—often referred to as social determinants of health—and environmental justice. These "social determinants" can include both positive and negative factors. Most broadly, "social determinants of health" that BLM should consider are:

> conditions in the environments in which people are born, live, learn, work, play, worship, and age that affect a wide range of health, functioning, and quality-of-life outcomes and risks. Conditions (e.g., social, economic, and physical) in these various environments and settings (e.g., school, church, workplace, and neighborhood) have been referred to as 'place.' In addition to the more material attributes of 'place,' the patterns of social engagement and sense of security and well-being are also affected by where people live. Resources that enhance quality of life can have a significant influence on population health outcomes. Examples of these resources include safe and affordable housing, access to education, public safety, availability of healthy foods, local emergency/health services, and environments free of life-threatening toxins.[79]

BLM's full analysis and disclosure of health and safety risks and impacts, including cumulative impacts, is particularly important given that typical methods of collecting and analyzing emissions data have often underestimated health risks by failing to adequately measure the intensity, frequency, and duration of community exposure to toxic chemicals from fracking and drilling; failing to examine the effects of chemical mixtures; and failing to consider vulnerable populations.[80] Of high concern, numerous studies highlight that health assessments of drilling and fracking emissions often fail to consider impacts on vulnerable populations including environmental justice communities[81] and children.[82] For example, a recent analysis of oil and gas development in California found that 14 percent of the state's population totaling 5.4 million people live within a mile of at least one oil and gas well. More than a third of these residents, totaling 1.8 million people, also live in areas most burdened by environmental pollution.[83] BLM also cannot dismiss the potential for elevated pollution concentrations —and associated, potentially significant health risks and effects—in rural areas simply because those areas are sparsely populated. The potentially significant air pollutant emissions from those wells cannot be ignored simply because they are located in rural areas. BLM also acknowledges the potential for health and safety risks and impacts from increased vehicle traffic associated with oil and gas

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[79] Office of Disease Prevention and Health Promotion, *Healthy People 2020: Social Determinants of Health*, *Available at* https://www.healthypeople.gov/2020/topics-objectives/topic/social-determinants-of-health.
[80] **Exhibit 67**, Brown, David et al., *Understanding Exposure From Natural Gas Drilling Puts Current Air Standards to the Test.* 29 REVIEWS ON ENVIRONMENTAL HEALTH 277 (2014).
[81] **Exhibit 68**, NRDC [Natural Resources Defense Council], Drilling in California: Who's At Risk?, October 2014 ("NRDC 2014"); **Exhibit 69**, Clough, Emily & Derek Bell, *Just Fracking: A Distributive Environmental Justice Analysis of Unconventional Gas Development in Pennsylvania, USA*, 11 Environmental Research Letters 025001 (2016); **Exhibit 70**, McKenzie, Lisa M. et al., *Population Size, Growth, and Environmental Justice Near Oil and Gas Wells in Colorado*, 50 ENVIRONMENTAL SCIENCE & TECHNOLOGY 11471 (2016).
[82] **Exhibit 71**, Webb, Ellen et al*., Developmental and reproductive effects of chemicals associated with unconventional oil and natural gas operations*, 29 Rev Environ Health 307 (2014).
[83] NRDC 2014, Exhibit 68.

development in the region. That traffic, too, likely contributes to additional criteria pollutant emissions (particulate matter and others.

The existing health status and pollution burdens experienced by individuals and populations in the lease sale areas, and the disproportionate health risks they face in light of social determinants of health and environmental justice concerns, are precisely the kinds of incremental impacts of the action when added to other past, present, and reasonably foreseeable future actions that NEPA requires BLM to analyze here. BLM cannot simply dismiss the incremental addition of wells from a particular lease sale (or the incremental increase in air pollution from those wells) as insignificant merely because they constitute a small percent increase *compared to* state, regional/basin-wide, or national well counts or emissions, or a small percent of total air pollutant emissions. This misses the entire point of NEPA's requisite cumulative impacts analysis—it is not to determine what *fraction* of regional, state, or national wells and emissions the wells and emissions from a particular lease sale make up. Quite the opposite—as with GHG emissions, rather than breaking emissions from an individual lease sale down into annual fractions or "component parts" in attempt to dismiss them as insignificant, BLM must analyze *additive* short *and* long-term emissions and their direct, indirect, and cumulative health effects from this lease sale. And, as with GHG emissions, BLM must put these emissions into context and discuss their potentially significant *impacts*, including health risks and impacts.

In addition, BLM must not summarily dismiss health and safety *impacts* as temporary simply because some *exposures* (e.g., to emissions and fugitive dust from construction) are temporary. It is arbitrary, and contrary to scientific understanding, to assume that just because an exposure is temporary, so too are the effects resulting from that exposure. The health effects that can arise from environmental exposures, especially in conjunction with social determinants of health and environmental justice issues, may endure long after the acute exposure source is gone. BLM should explain how HAP emissions from this lease sale, coupled with other reasonably foreseeable direct, indirect, and cumulative emissions and effects, could affect these populations, take this into account in its decision-making, and articulate a rational connection between the facts found and the choices made regarding leasing.

We urge BLM to consider, and disclose to the public directly in its NEPA documents, context for EPA's risk ranges, even as there is no singular "safe" threshold for HAPs. While BLM acknowledges that there are populations who could experience increased risks associated with HAPs exposure, the agency should take the next step and discuss how this informs a determination of significance and articulate a rational connection between the facts found and the leasing decisions made. BLM must ensure that the additional information informs its decision-making, and articulate a rational connection between the facts found and the choices made. This is particularly important given the potential for cancer risks to "the most exposed.

BLM also cannot dismiss cumulative health impacts as temporary, and thus avoid taking a hard look at cumulative impacts, by simply assuming that wells will be properly plugged and reclaimed at the end of their useful lives, and thus cease to cause health risks and impacts at that time. For one, a well's time in production can span decades. BLM must analyze cumulative emissions and their impacts over the full life course of a well, in conjunction with other wells in

the lease sale areas *and* other past, present, and reasonably foreseeable future actions and emissions. Moreover, information from several states, and nationally, indicates that wells often are *not* properly plugged and reclaimed at the end of their "useful lives." For example, while it is sometimes difficult to obtain an exact count of "orphaned" or improperly plugged and abandoned wells, reports indicate that there are hundreds, even thousands, of such wells across private, state, and federal lands in nearby Western states such as Colorado, New Mexico, and Wyoming.[84] These wells can leach toxic chemicals and contaminate water supplies, posing direct and cumulative health risks to nearby communities.[85] State and BLM bonding requirements are usually insufficient to meet the costs associated with plugging and abandoning these wells, retiring other equipment, and cleaning up the well sites. Thus, idle or orphaned wells and abandoned well sites pose not only health risks and impacts, but also financial ones,[86] which can further compound existing health impacts, including cumulative impacts, and related health inequities.[87]

iii. Health and Environmental Justice.

BLM also failed take a hard look at the inexorable relationship between health and environmental justice. As mentioned above, BLM nominally acknowledges, but does not fully analyze, health and safety impacts in the EA. It is difficult to see how BLM can possibly analyze, let alone take NEPA's requisite hard look at, environmental justice impacts without properly analyzing health and safety impacts, particularly cumulative and disproportionate risks and impacts. An environmental justice analysis must contain more than a textbook citation to agency guidance or tables listing demographic data and identifying the general existence of "environmental justice" populations of concern or potential for disproportionate impacts in the lease sale area, with no discussion of actual risks and impacts to those populations or how those risks and impacts might be mitigated or avoided. Merely providing a textbook citation to the definitions of environmental justice populations, or *listing* and describing environmental justice populations in the lease sale area, without engaging in any further analysis or public disclosure of the *impacts* of its leasing decisions on these populations, is arbitrary and capricious and fails to satisfy NEPA's hard look mandate.

The inequities at which BLM must take a hard look in an environmental justice analysis are not incidental, nor are they biologically determined—they are structural, systemic, and part of an unjust historical and ongoing pattern and practice of environmental racism, settler colonialism, and treatment of communities in the leasing areas as energy sacrifice zones. And, as discussed throughout these comments, there are several other health risks and impacts BLM should also analyze in the context of health and environmental justice, particularly in light of social and structural factors that affect health.

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[84] *See, e.g.,* **Exhibit 72**, Joshua Zaffos, *'Orphaned' Oil and Gas Wells are on the Rise.* HIGH COUNTRY NEWS, Jan. 16, 2018. *Available at* https://www.hcn.org/issues/50.3/energy-industry-orphaned-oil-and-gas-wells-are-on-the-rise.
[85] *Id*. Exhibit 72.
[86] *Id.* Exhibit 72; *See also* **Exhibit 73,** U.S. Gov't Accountability Office, Oil and Gas Wells: Bureau of Land Management Needs to Improve its Data and Oversight of Its Potential Liabilities 1, GAO-18-250 (May 2018), available at: https://www.gao.gov/assets/700/691810.pdf; **Exhibit 74,** U.S. Gov't Accountability Office, Bureau of Land Management Should Address Risks from Insufficient Bonds to Reclaim Wells, GAO-19-615 (Sept. 2019).
[87] PSR 2023, Exhibit 61.

In conducting this analysis, BLM can and should synthesize existing local health, socioeconomic, and other data in the lease sale areas—for example, county health statistics and reports, locally-conducted health impact assessments,[88] where available, or mapping of pollution exposure risks and demographic data——and the best available science, including but not limited to the peer-reviewed studies and sources mentioned in these comments.

iv. Air Pollution and Health Impacts.

Air pollution is of particular concern with respect to health impacts of this lease sale, including not only direct impacts, but also cumulative risks and impacts and historical patterns of multiple and cumulative exposures The potential harms resulting from exposure to dangerous air pollutants associated with fracking and drilling are serious and wide-ranging. A growing body of scientific research has documented adverse health impacts from air pollution related to unconventional oil and gas development or fracking, including studies showing air pollutants at levels associated with reproductive and developmental harms and increased risk of morbidity and mortality.[89] More broadly, a recent study found that if implemented, nationwide efforts to eliminate energy-related emissions, including from oil and gas production could prevent as many as 53,200 premature deaths each year and would provide $608 billion in benefits from avoided $PM_{2.5}$-related illness and death.[90]

The range of illnesses that can result from the wide array of air pollutants from fracking were summarized in a study by Dr. Theo Colburn, which charts which fracking chemicals have been linked to certain illnesses.[91] This study analyzed air samples taken during drilling operations near natural gas wells and residential areas in Garfield County, Colorado, and detected 57 chemicals between July 2010 and October 2011, including 44 with reported health effects.[92] For example:

> Thirty-five chemicals were found to affect the brain/nervous system, 33 the liver/metabolism, and 30 the endocrine system, which includes reproductive and developmental effects. The categories with the next highest numbers of effects were

[88] Health Impact Assessment, or HIA, is a process that helps evaluate the potential health effects of a plan, project, or policy before it is built or implemented. HIA brings potential positive and negative public health impacts and considerations to the decision-making process for plans, projects, and policies that fall outside traditional public health arenas, such as transportation and land use. An HIA provides practical recommendations to increase positive health effects and minimize negative health effects." Centers for Disease Control and Prevention (CDC), "Health Impact Assessment" (Sept. 19, 2016), https://www.cdc.gov/healthyplaces/hia.htm.

[89] **Exhibit 75**, Hays, Jake & Seth B.C. Shonkoff , *Towards an Understanding of the Environmental and Public Health Impacts of Unconventional Natural Gas Development: A Categorical Assessment of the Peer-Reviewed Scientific Literature*, 11 PLoS ONE e0154164 (2016); Webb, Ellen et al.; **Exhibit 76**, Clean Air Task Force, Fossil Fumes: A Public Health Analysis of Toxic Air Pollution From the Oil and Gas Industry, June 2016, *available at* http://www.catf.us/resources/publications/files/FossilFumes.pdf.

[90] **Exhibit 77**, Mailloux, N. A., Abel, D. W., Holloway, T., & Patz, J. A. (2022). Nationwide and regional PM2.5-related air quality health benefits from the removal of energy related emissions in the United States. GeoHealth, 6, e2022GH000603. https:// doi.org/10.1029/2022GH000603. ($PM_{2.5}$ is fine particulate matter that results from a number of energy production activities, including oil and gas. This study also looked at the benefits of removal of sulfur dioxide, and nitrogen oxides, pollutants often released with $PM_{2.5}$, including from the oil and gas sector).

[91] **Exhibit 78**, Theo Colborn *et al.*, *An exploratory study of air quality near natural gas operations*, HUM. ECOL. RISK ASSESS. (Nov. 9, 2012) [Hereinafter Colborn 2012].

[92] *Id.* at pp. 21–22 (pages refer to page numbers in attached manuscript and not journal pages), Exhibit 78.

> the immune system (28), cardiovascular/blood (27), and the sensory and respiratory systems (25 each). Eight chemicals had health effects in all 12 categories. There were also several chemicals for which no health effect data could be found.[93]

The study found extremely high levels of methylene chloride, which may be used as cleaning solvents to remove waxy paraffin that is commonly deposited by raw natural gas in the region. These deposits solidify at ambient temperatures and build up on equipment.[94] While none of the detected chemicals exceeded governmental safety thresholds of exposure, the study noted that such thresholds are typically based on "exposure of a grown man encountering relatively high concentrations of a chemical over a brief time period, for example, during occupational exposure."[95] Consequently, such thresholds may not apply to individuals experiencing "chronic, sporadic, low-level exposure," including sensitive populations such as children, the elderly, and pregnant women.[96] For example, the study detected polycyclic aromatic hydrocarbon (PAH) levels that could be of "clinical significance," as recent studies have linked low levels of exposure to lower mental development in children who were prenatally exposed.[97] In addition, government safety standards do not take into account "the kinds of effects found from low-level exposure to endocrine-disrupting chemicals . . ., which can be particularly harmful during prenatal development and childhood.[98]

A rigorous study by Johns Hopkins University, which examined 35,000 medical records of people with asthma in Pennsylvania, found that people who live near a higher number of, or larger, active gas wells were 1.5 to 4 times more likely to suffer from asthma attacks than those living farther away, with the closest groups having the highest risk.[99] Relatedly, a 2018 study of pediatric asthma-related hospitalizations found that children and adolescents exposed to newly spudded unconventional natural gas development wells within their zip code had 1.25 times the odds of experiencing an asthma-related hospitalization compared to children who did not live in these communities. Furthermore, children and adolescents living in a zip code with any current or previous drilling activity had 1.19 times the odds of experiencing an asthma-related hospitalization compared to children who did not live in these communities. Amongst children and adolescents (ages 2–18), children between 2 and 6 years of age had the greatest odds of hospitalization in both scenarios.[100]

BLM should analyze these asthma-related effects in relation to existing asthma rates and related impacts in the communities adjacent to and counties encompassing the proposed lease sale.[101] Air pollution-related asthma, in particular, can exert profound and widespread cumulative

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[93] *Id.* at 11, Exhibit 78.
[94] *Id.* at 10, Exhibit 78.
[95] *Id.* at 11–12, Exhibit 78.
[96] *Id.* at 12, Exhibit 78.
[97] *Id.* at 10–11, Exhibit 78.
[98] *Id.* at 12, Exhibit 78.
[99] **Exhibit 79**, Rasmussen, Sara G. *et al.*, *Association Between Unconventional Natural Gas Development in the Marcellus Shale and Asthma Exacerbations,* 176 JAMA INTERNAL MEDICINE 1334 (2016).
[100] **Exhibit 80**, Willis, Mary D. et al., *Unconventional natural gas development and pediatric asthma hospitalizations in Pennsylvania,* 166 ENVIRONMENTAL RESEARCH 402 (2018).
[101] For example, NM Dept of Health provides Health Indicator Reports tracking asthma rates and Emergency Department visits by county and comparing the rates in each county to one another and to the state average. *See* **Exhibit 81**, New Mexico Department of Health, *Health Indicator Report of Asthma Emergency Department Visits*

health effects throughout a person's life course, especially when combined with social determinants of health. For example, children with asthma are much more likely to miss school, hurting their educational prospects as well as their health (with some adverse health effects enduring into adulthood), and resulting in significant funding losses for local schools.[102] As the New Mexico Department of Health has noted,[103] and nationwide studies confirm,[104] "low-income" populations and "environmental justice" populations face not only disproportionate asthma risks, but also significant difficulty managing their asthma, in part due to lack of access to health care.

Ozone is a criteria pollutant of particular concern that contributes to asthma and missed school days (and one that can, in general, adversely affect health, especially for "sensitive groups" such as children, the elderly, and those with pre-existing health issues). Background concentrations of ozone in some of the lease sale areas are already at or exceed the National Ambient Air Quality Standards ("NAAQS"), leaving virtually no room for growth in emissions. Several studies that measured and/or modeled gas-related air emissions in various states have identified significant increases in ground level ozone as a result of natural gas development.[105] Ozone was once a summertime urban phenomenon but is now being seen increasingly in western rural areas during the winter due to the natural gas boom, so much so that some relatively small cities are no longer in compliance with the federal regulations that set allowable ozone levels.[106]

Ozone can cause difficulty breathing, coughing and sore throat. It can also inflame and damage the airways. It aggravates lung diseases like asthma, emphysema, and chronic bronchitis. It can make the lungs more susceptible to infection and it can continue to damage the lungs even when the symptoms have disappeared.[107] Children are particularly vulnerable because their lungs are still developing until about age 18.[108] As their lungs grow in the presence of ozone, their alveoli production is reduced, and they can end up with smaller, more brittle lungs. Women exposed during pregnancy deliver preterm, low birth weight babies with a high probability of developing asthma. In a letter to former EPA Administrator Lisa Jackson, a group of five national medical and public health groups wrote that the most vulnerable individuals, including children, teens, senior citizens, people who exercise or work outdoors, and people with chronic

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Among Children (Last Visited November 18, 2021). *Available at* https://ibis.health.state.nm.us/indicator/complete_profile/AsthmaEDChild.html. To the extent similar information is available for the proposed lease sale, BLM should take that information into account in its analyses and decision-making.

[102] *See* **Exhibit 82**, Attendance Works, *Mapping the Early Attendance Gap* (2017). *Available at* http://www.attendanceworks.org/wp-content/uploads/2017/05/Mapping-the-Early-Attendance-Gap_Final-4.pdf.

[103] **Exhibit 83**, New Mexico Dept. of Health*, The Burden of Asthma in New Mexico: 2014 Epidemiology Report* (Jan. 2014), at 41. Available at https://nmhealth.org/data/view/environment/54/.

[104] *See, e.g.,* **Exhibit 84**, Tim Kelley and Gregory D. Kearney, *Insights Into the Environmental Health Burden of Childhood Asthma*, 12 ENVIRONMENTAL HEALTH INSIGHTS doi: 10.1177/1178630218757445 (Feb. 20, 2018).

[105] *See, e.g.,* **Exhibit 85**, Seth Lyman and Howard Shorthill, *Final Report: 2012 Uintah Basin Winter Ozone & Air Quality Study*, UTAH STATE UNIVERSITY, February 1, 2013.

[106] **Exhibit 86,** Gabrielle Pétron, *et al*., *Estimation of emissions from oil and natural gas operations in northeastern Colorado*, Power Point available at: http://www.epa.gov/ttnchie1/conference/ei20/session6/gpetron_pres.pdf.

[107] *See* **Exhibit 87,** EPA, *Ozone – Good Up High Bad Nearby*, available at: http://www.epa.gov/oar/oaqps/gooduphigh/bad.html#7.

[108] *See* **Exhibit 88,** U.S. EPA, "Children are Not Little Adults," *https://www.epa.gov/children/children-are-not-little-adults.*

lung diseases like asthma, COPD, and emphysema, are most in danger of being sickened by ozone and that children who grow up in areas of high ozone pollution may never develop their full lung capacity as adults, which can put them at greater risk of lung disease throughout their lives.[109]

In addition, oil and gas air pollution exacerbates cancer risks. A recent Yale University study identified numerous fracking chemicals that are known, probable, or possible human carcinogens (20 air pollutants) and/or are linked to increased risk for leukemia and lymphoma (11 air pollutants), including benzene, 1,3-butadiene, cadmium, diesel exhaust, and polycyclic aromatic hydrocarbons.[110] And a 2018 study by McKenzie et al. conducted in the Denver Julesberg Basin on the Colorado Northern Front Range (CNFR) found that the established setback distance of 152 m (500 ft) did little to protect people in that proximity. In analyses of nonmethane concentrations from 152 to >1600 meters from oil and gas facilities, the study found that the EPA's minimum cumulative lifetime excess cancer risk benchmark of 1 in a million was exceeded. Cumulative lifetime excess cancer risk increased with decreasing distance from the nearest oil and gas facility. Residents living within 610 meters of and oil and gas facility had an overall cancer risk in excess of the EPA's upper bound for remedial action of 1 in 10,000. Furthermore, residents within 152 meters of an oil and gas facility had an overall excess cancer risk of 8.3 in 10,000, along with an increased likelihood of neurological, hematological, and developmental health effects. Over 95% of the total risk was due to benzene, with additional risk due to the presence of toluene, ethylbenzene, xylene, and alkanes.[111] Other studies have found that residents living closer to drilling and fracking operations had higher hospitalization rates[112] and reported more health symptoms including upper respiratory problems and rashes.[113]

v. Water Quality and Quantity and Health Impacts.

With respect to water quality and quantity and health impacts, in addition to the considerations discussed *infra*, BLM should also consider how its authorization of this lease sale and reasonably foreseeable development of the leases could exacerbate water quality-related health impacts associated with PFAS contamination. For example, a 2023 report by Physicians for Social Responsibility (PSR) reveals the staggering amount of these health-harming "forever chemicals" known to be used in oil and gas operations in New Mexico—not to mention additional PFAS chemicals that are likely present but not disclosed due to trade secret protections.[114] BLM should take this report and the concerns it raises into account in its analysis

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[109] *See* **Exhibit 89**, Letter from American Lung Association to U.S. EPA (November 30, 2011).
[110] **Exhibit 90**, Elliot, Elise G. et al., *A Systematic Evaluation of Chemicals in Hydraulic-Fracturing Fluids and Wastewater for Reproductive and Developmental Toxicity*, 27 JOURNAL OF EXPOSURE SCIENCE AND ENVIRONMENTAL EPIDEMIOLOGY 90 (2016).
[111] **Exhibit 91**, McKenzie, Lisa et al., *Ambient Nonmethane Hydrocarbon Levels Along Colorado's Northern Front Range: Acute and Chronic Health Risks*, 52 ENVIRONMENTAL SCIENCE & TECHNOLOGY 4514 (2018).
[112] **Exhibit 92**, Jemielita, Thomas et al., *Unconventional Gas and Oil Drilling Is Associated with Increased Hospital Utilization Rates.* 10 PLoS ONE e0131093 (2015).
[113] **Exhibit 93**, Rabinowitz, Peter M. et al., *Proximity to Natural Gas Wells and Reported Health Status: Results of a Household Survey in Washington County, Pennsylvania*, 123 ENVT'L HEALTH PERSPECTIVES 21.
[114] **Exhibit 94,** Horwitt, Dusty and Gottlieb, Barbara, Physicians for Social Responsibility, *Fracking with Forever Chemicals in New Mexico* (April 12, 2023) *Available at https://psr.org/new-psr-report-reveals-oil-gas-companies-fracked-new-mexico-wells-with-pfas/.*

and decision-making with respect to health impacts and potential impacts to groundwater and drinking water from PFAS "forever chemicals" used in oil and gas drilling and fracking.

vi. Prenatal and Child Health Impacts.

Numerous studies also suggest that higher parental exposure to fracking and drilling during pregnancy can increase the incidence of high-risk pregnancies, premature births, low-birthweight babies, and birth defects.[115] A study of more than 1.1 million births in Pennsylvania found evidence of a greater incidence of low-birth-weight babies and significant declines in average birth weight for babies born to people living within 3 kilometers of fracking sites.[116] The study estimated that about 29,000 U.S. births each year occur within 1 kilometer of an active fracking site and "that these births therefore may be at higher risk of poor birth outcomes." A study of 9,384 pregnant people in Pennsylvania found that those who live near active drilling and fracking sites had a 40 percent increased risk for having premature birth and a 30 percent increased risk for having high-risk pregnancies.[117] Another Pennsylvania study found that pregnant people with greater exposure to gas wells during pregnancy—measured in terms of proximity and density of wells—had a much higher risk of having low-birthweight babies; the researchers identified air pollution as the likely route of exposure.[118] In rural Colorado, those people with greater exposure to natural gas wells during pregnancy had a higher risk of having babies with congenital heart defects and possibly neural tube defects.[119] A July 2020 study found that residential proximity to flaring (the open combustion of natural gas) from oil and gas development was associated with an increased risk of preterm birth, specifically for "Hispanic" women, in the Eagle Ford Shale of Texas.[120] Here, again, these documented risks are of particular concern in certain communities near the proposed lease sale in light of environmental justice concerns, like proximity of homes to multiple wells[121] (an exacerbating factor in the Eagle Ford Shale study), and social and structural inequities, such as limited access to prenatal care. BLM should have taken local health data like this into account as part of its "hard look" at health impacts, especially as they relate to social determinants of health and environmental justice.

vii. Occupational Health and Safety Impacts

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[115] *See, e.g.,* PSR 2023 at 263–265, Exhibit 94.
[116] Currie, Janet et al., Exhibit 55.
[117] **Exhibit 95**, Casey, Joan A., *Unconventional Natural Gas Development and Birth Outcomes in Pennsylvania, USA*, 27 EPIDEMIOLOGY 163 (2016).
[118] **Exhibit 96**, Stacy, Shaina L. et al., *Perinatal Outcomes and Unconventional Natural Gas Operations in Southwest Pennsylvania*. 10 PLoS ONE e0126425 (2015).
[119] McKenzie, *Birth Outcomes* (2014), Exhibit 54.
[120] Lara J. Cushing et al. *Flaring from Unconventional Oil and Gas Development and Birth Outcomes in the Eagle Ford Shale in South Texas*, 128 ENVIRONMENTAL HEALTH PERSPECTIVES, 077003 (2020), Exhibit 36.
[121] *See* EDF, New Mexico Oil and Gas Data tool, available at https://www.edf.org/nm-oil-gas/, for one excellent resource for mapping proximity of homes to wells, along with other environmental-justice-relevant data, specifically in New Mexico. We recommend that BLM use this and other available tools for taking a hard look at cumulative health impacts and environmental justice impacts.

Those *living* near oil and gas development aren't the only ones at risk. Oil and gas *workers* also suffer high risks from toxic exposure and accidents.[122] One study of the occupational inhalation risks caused by emissions from chemical storage tanks associated with fracking wells found that chemicals used in 12.4 percent of wells posed acute non-cancer risks, chemicals used in 7.5 percent of wells posed acute cancer risks, and chemicals used in 5.8 percent of wells posed chronic cancer risks.[123] As summarized below:

> Drilling and fracking jobs are among the most dangerous jobs in the nation with a fatality rate that is four to seven times the national average. Irregularities in reporting practices mean that counts of on-the-job fatalities among oil and gas workers are likely underestimates . . .. Occupational hazards in the fracking industry include head injuries, traffic accidents, blunt trauma, burns, inhalation of hydrocarbon vapors, toxic chemical exposures, heat exhaustion, dehydration, and sleep deprivation. An investigation of occupational exposures found high levels of benzene in the urine of wellpad workers, especially those in close proximity to flowback fluid coming up from wells following fracturing activities. Exposure to silica dust, which is definitively linked to silicosis and lung cancer, was singled out by the National Institute for Occupational Safety and Health as a particular threat to workers in fracking operations where silica sand is used. At the same time, research shows that many gas field workers, despite these serious occupational hazards, are uninsured or underinsured and lack access to basic medical care.[124]

In addition, many oilfield workers may lack basic social and economic safety nets and lack support from their employer in mitigating risks and addressing harms such as those mentioned above. A recent survey of current and former oilfield workers in New Mexico's Permian Basin revealed that, there, about 57 percent of workers surveyed were not provided health insurance by their employer.[125] Just 21 percent got retirement benefits and 78 percent did not have access to unemployment, yet 69% reported being laid off or having their hours cut during dips in the volatile market.[126] Almost half of respondents (46%) said they had an accident on the job.[127] BLM should take information like this into account in its NEPA analysis of health risks and impacts, socioeconomics, and environmental justice, and in particular, should factor

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[122] **Exhibit 97**, Esswein, Eric J. et al., *Occupational Exposures to Respirable Crystalline Silica During Hydraulic Fracturing*, 10 JOURNAL OF OCCUPATIONAL AND ENVIRONMENTAL HYGIENE 347 (2013); **Exhibit 98**, Esswein, Eric et al., *Evaluation of Some Potential Chemical Exposure Risks during Flowback Operations in Unconventional Oil and Gas Extraction: Preliminary Results*, 11 J. OF OCCUPATIONAL AND ENVT'L HYGIENE D174 (2014); **Exhibit 99**, Harrison, Robert J. *et al*., *Sudden Deaths Among Oil and Gas Extraction Workers Resulting from Oxygen Deficiency and Inhalation of Hydrocarbon Gases and Vapors — United States, January 2010–March 2015*, 65 MMWR MORB. MORTAL WKLY. REP. 6 (2016); PSR 2023, Exhibit 61.

[123] **Exhibit 100**, Chen, Huan & Kimberly E. Carter, *Modeling potential occupational inhalation exposures and associated risks of toxic organics from chemical storage tanks used in hydraulic fracturing using AERMOD*, 224 ENVIRONMENTAL POLLUTION 300 (2017).

[124] PSR 2023 at 234, Exhibit 58.

[125] **Exhibit 101,** Sanchez *et al.*, *Southeastern New Mexico Oil and Gas Workforce Study* (January 2024), available at https://files.constantcontact.com/b6dfe469001/7eec220a-7cab-47d8-8370-62e981dc403a.pdf?rdr=true, *see especially* p. 16.

[126] *Id.*

[127] *Id.*

information like this into its consideration of any purported socioeconomic benefits of oil and gas development to individuals or communities associated with the proposed lease sale.

viii. Naturally Occurring Radioactive Materials and Technology Enhanced Naturally Occurring Radioactive Materials.

Radioactive wastes from oil and gas production can be found in produced water, flowback water from hydraulic fracturing, drilling waste including cuttings and mud, and/or sludge. This material can concentrate in pipes, storage tanks and facilities, and on other extraction equipment, and may be left on site or be emitted into the environment. Some of these materials, such as Radium, can penetrate the skin and raise the risk of cancer.[128] BLM must consider the potential health impacts of radioactive materials, as well as all other potential health effects discussed herein.

Processes used to produce oil and gas often generate radioactive waste containing concentrations of naturally occurring radioactive materials (NORM) and Technologically Enhanced Naturally Occurring Radioactive Materials (TENORMS). The geological formations to be drilled will result in radioactive waste, containing both NORMS and TENORMs. The radioactive materials will show up in formation drilling, production wastes, and operations. Every single shale well that uses an on-site pit for disposal of drill cuttings and/or fluids likely will leave behind some amount of concentrated radioactive materials.[129] Further, Alpha-emitting radioactive decay elements concentrate at the pipe scale, so the waste is much more radioactive than any of the constituent parts.[130] BLM must also evaluate radiation exposure risks as part of its obligation to take a hard look at public health and safety. Further, BLM should conduct a baseline groundwater analysis in the lease sale areas before any more leasing and development occurs, to ensure that no environmental contamination occurs from disposal of radioactive sludge/scale.

F. BLM Must Take a Hard Look at Environmental Justice.

BLM must also take a hard look at environmental justice—not just in relation to health, but also in its own right. Environmental justice means the fair treatment and meaningful involvement of all people, regardless of race, color, national origin, or income, in the development, implementation, and enforcement of environmental laws, regulations, and policies.[131] An environmental justice analysis must also include "the cultural values that the community and/or Indian Tribe may place on a natural resource at risk."[132] It is "essential" for the "NEPA analyst to consider the cumulative impacts from the perspective of these specific

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[128] *See, e.g.,* **Exhibit 102**, Agency for Toxic Substances and Disease Registry (ASTDR). *Radium.* (July 1999), *Available at* https://www.atsdr.cdc.gov/toxfaqs/tfacts144.pdf; (Beta and gamma particles can penetrate the skin).
[129] *See* **Exhibit 103**, Occupational Health and Safety (Oct. 01, 2012) "Radiation Sources in Natural Gas Well Activities," https://ohsonline.com/Articles/2012/10/01/Radiation-Sources-in-Natural-Gas-Well-Activities.aspx?Page=2.
[130] **Exhibit 104**, USGS (1999) Naturally Occurring Radioactive Materials (NORM) in Produced Water and Oil-Field Equipment—An Issue for the Energy Industry https://pubs.usgs.gov/fs/fs-0142-99/fs-0142-99.pdf.
[131] Although the U.S. Environmental Protection Agency under the current administration has removed online references to this term, the definition offered here has been commonly used by the agency in prior years.
[132] **Exhibit 105**, 1998 EPA NEPA Final Guidance https://www.epa.gov/sites/production/files/2015-02/documents/ej_guidance_nepa_epa0498.pdf.

resources or ecosystems which are vital to the communities of interest."[133] BLM must incorporate Tribes' and community members' knowledge of, and concerns about, such cultural values and cumulative impacts in its NEPA analyses for the lease sale.

BLM must also adhere to the "process" requirements of environmental justice—fair treatment and *meaningful involvement*. If BLM ignores or excludes the very people and communities who are most affected by its leasing decisions, BLM is not only denying them fair treatment and meaningful involvement in decision-making—and, in the case of indigenous peoples and Tribes, abrogating the right to self-determination and free prior and informed consent[134]—but also depriving itself, and the general public, of invaluable knowledge and expertise that would enable better-informed and more transparent decision-making.

G. BLM Must Take a Hard Look at Impacts to Resources Other Than Climate from Development of The Proposed Leases.

BLM must analyze and disclose the reasonably foreseeable impacts to a variety of non-climate resources from drilling on these particular leases. In particular, BLM must take a hard look at the impacts to groundwater, wildlife and other resources that will be harmed by oil and gas development resulting for its leasing decisions.

BLM may not simply provide broad descriptions of categories of impacts that result from oil and gas development generally, without examining how severe those impacts are likely to be for the particular leases being offered here. Such boilerplate could be applied to virtually any oil and gas proposal anywhere on public lands and provides the agency and the public no useful information about the specific leases proposed in this lease sale.

a. BLM Failed to Take a Hard Look at Impacts to Groundwater from Well Construction Practices and Hydraulic Fracturing.

The EA violates NEPA by failing to adequately analyze the reasonably foreseeable impacts to groundwater from drilling on the proposed lease sale. The EA contains generic boilerplate about potential water impacts from oil and gas development and identifies the watersheds that will potentially be affected, but it tells the agency and the public little about the development of these leases.

Groundwater is a critical resource that supplies many communities, particularly rural ones, with drinking water. Protecting both the quality and quantity of these resources is imperative to protect human health and the environment, especially because groundwater will become more important as increased aridity and higher temperatures alter water use. The U.S.

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[133] *Id.* Exhibit 105.

[134] The duty to obtain free prior and informed consent (FPIC) from indigenous peoples is recognized by the International Labour Organization Convention ("ILO") 169 and the U.N. Declaration on the Rights of Indigenous Peoples ("UNDRIP"), Articles 10, 11, 19, 28, 29, and 32. *See* **Exhibit 106**, UN General Assembly, *United Nations Declaration on the Rights of Indigenous Peoples.* FPIC is embedded in the right to self-determination. "The duty of States to obtain Indigenous Peoples' FPIC entitles Indigenous people to effectively determine the outcome of decision-making that affects them, *not merely a right to be involved*." **Exhibit 107,** UN Expert Mechanism on the Rights of Indigenous Peoples, *Final report of the study on indigenous peoples and the right to participate in decision-making* (August 17, 2011), *see especially* para. 21.

Environmental Protection Agency (EPA) has noted that existing drinking water resources "may not be sufficient in some locations to meet future demand" and that future sources of fresh drinking "will likely be affected by changes in climate and water use."[135] As a result, BLM must protect both aquifers currently used for drinking water, and deeper and higher-salinity aquifers that may be needed in coming decades.

Oil and gas drilling involves boring wells to depths thousands of feet below the surface, often through or just above groundwater aquifers. Without proper well construction and vertical separation between aquifers and fractured formations, oil and gas development can contaminate underground sources of water.[136] However, federal rules and regulations do not provide specific direction for BLM and operators to protect all usable water. Even rules that purport to do so, like Onshore Order No. 2's requirement to "protect and/or isolate all usable water zones," are inconsistently applied and often disregarded in practice.[137] State regulations are similarly inadequate to ensure protection of groundwater.

Moreover, industry has admitted that it often does not protect usable water in practice. Western Energy Alliance and the Independent Petroleum Association of America have told BLM that the "existing practice for locating and protecting usable water" does not measure the numerical quality of water underlying drilling locations, and therefore does not consider whether potentially usable water would be protected during drilling.[138] For example, reports studying samples of existing oil and gas well records in Wyoming and Montana confirm industry admissions that well casing and cementing practices do not always protect underground sources of drinking water.[139] Similarly, a study of hydraulic fracturing in Pavillion, Wyoming, confirmed that oil and gas drilling had contaminated underground sources of drinking water in that area due to lack of vertical separation between the aquifer and target formation.[140]

In light of these risks to a critical resource, BLM must evaluate potential groundwater impairment. As a threshold matter, BLM must provide a detailed account of all regional groundwater resources that could be impacted, including usable aquifers that may not currently be used as a drinking water supply. The accounting must include, at minimum, all aquifers with up to 10,000 parts per million total dissolved solids, and it cannot substitute existing drinking water wells or any other incomplete proxy for a full description of all usable or potentially usable

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[135] U.S. Environmental Protection Agency, *Hydraulic Fracturing for Oil and Gas: Impacts from the Hydraulic Fracturing Water Cycle on Drinking Water Resources in the United States*, EPA/600/R-16/236F, at 2–18 (Dec. 2016) (EPA 2016 Report).

[136] *See, e.g.*, *Fracking Can Contaminate Drinking Water*, Exhibit 52; **Exhibit 108**, Dominic C. DiGiulio & Robert A. Jackson, *Impact to Underground Sources of Drinking Water and Domestic Wells from Production Well Stimulation and Completion Practices in the Pavillion, Wyoming Field*, 50 Am. Chem. Society, Envtl. Sci. & Tech. 4524, 4532 (Mar. 29, 2016); EPA 2016 Report.

[137] *See* **Exhibit 109,** BLM, Regulatory Impact Analysis for the Final Rule to Rescind the 2015 Hydraulic Fracturing Rule, at 44–45 (Dec. 2017). Available at https://beta.regulations.gov/document/BLM-2017-0001-0464.

[138] **Exhibit 110**, Western Energy Alliance and the Independent Petroleum Association of America, Sept. 25, 2017, comments Re: RIN 1004-AE52, Oil and Gas; Hydraulic Fracturing on Federal and Indian Lands; Rescission of a 2015 Rule (82 Fed. Reg. 34,464) (2017 WEA comments), at 59. Available at https://www.regulations.gov/document?D=BLM-2017-0001-0412.

[139] **Exhibit 111,** Rebecca Tisherman, et al., *Examination of Groundwater Resources in Areas of Wyoming Proposed for the June 2022 BLM Lease Sale* (May 12, 2022).

[140] DiGiulio, *Impact to Underground Sources of Drinking Water and Domestic Wells*, 50 AM. CHEM. SOCIETY, ENVTL. SCI. & TECH. at 4532 (Mar. 29, 2016), Exhibit 108.

groundwater in the region. Second, BLM must use that accounting to assess how new oil and gas wells might impact these resources. That evaluation must assess the sufficiency of protective measures that will be employed, including wellbore casing and cementing and vertical separation between aquifers and the oil and gas formations likely to be hydraulically fractured.

b. BLM Failed to Take a Hard Look at Specific Impact Threats to Groundwater in Cave and Karst Landscapes

Additionally, adequate consideration must also be given for cave and karst landscapes which are currently known to or may exist in the proposed leasing areas – landforms characterized by underground drainage through solutionally enlarged conduits. Gypsum karst terranes may contain sinkholes, sinking streams, caves, and springs. These karst features, as well as occasional fissures and discontinuities in the bedrock, provide the primary sources for rapid recharge of the groundwater aquifers of many regions. Cave and karst features provide direct conduits leading to groundwater, which can quickly transport surface and subsurface contaminants directly into underground water systems and freshwater aquifers without filtration or biodegradation.[141] Highly sensitive cave and karst areas with critical freshwater aquifer recharge concerns may have a number of special surface and subsurface planning and construction requirements based upon the risk of adverse impacts created by a specific location or process.

In cave and karst terranes, rainfall and surface runoff is directly channeled into natural underground water systems and aquifers. Changes in geologic formation integrity, runoff quantity/quality, drainage course, rainfall percolation factors, vegetation, surface contour, and other surface factors can negatively impact cave ecosystems and aquifer recharge processes.[142] Blasting, heavy vibrations, and focusing of surface drainages can lead to slow subsidence, sudden collapse of subsurface voids, and/or cave ecosystem damage.

Both construction and production operations can have specific impacts on cave and karst systems. The construction of roads, pipelines, well pads and utilities can impact bedrock integrity and reroute, impede, focus, or erode natural surface drainage systems. Increased silting and sedimentation from construction can plug downstream sinkholes, caves, springs, and other components of aquifer recharge systems and result in adverse impacts to aquifer quality and cave environments. Any contaminants released into the environment during or after construction can impact aquifers and cave systems. A possibility exists for slow subsidence or sudden surface collapse during construction operations due to collapse of underlying cave passages and voids, as well as uncontrollable losses of drilling fluid and gas kicks.[143] This would cause associated safety hazards to the operator and the potential for increased environmental impact. Subsidence processes can be triggered by blasting, intense vibrations, rerouting of surface drainages, focusing of surface drainage, and general surface disturbance. Blasting fractures in bedrock can serve as direct conduits for transfer of contaminants into cave and groundwater systems. Blasting also creates an expanded volume of rock rubble that cannot be reclaimed to natural contours, soil

[141] *See*, *e.g.*, **Exhibit 112,** Koosha Kalhor, et al., *Assessment of groundwater quality and remediation in karst aquifers: A review,* 8 GROUNDWATER FOR SUSTAINABLE DEV. 104 (2019).
[142] See **Exhibit 113,** BLM Handbook H-8380-1 20–24, *Cave and Karst Resources Management Handbook* (2015).
[143] *See*, *e.g.*, **Exhibit 114,** Danil Maksimov, et al. *Real-Time Detection of Karstification Hazards While Drilling in Carbonates*, 15 ENERGIES 4951 (2022).

condition, or native vegetative condition. As such, surface and subsurface disruptions from blasting procedures can lead to permanent changes in vegetation, rainfall percolation, silting/erosion factors, aquifer recharge, and freshwater quality and can increase the risk of contaminant migration from drilling/production facilities built atop the blast area. During drilling, previously unknown cave and karst features could be encountered.[144] If a void is encountered while drilling and a loss of circulation occurs, lost drilling fluids can directly contaminate groundwater recharge areas, aquifers, and groundwater quality. Drilling operations can also lead to sudden collapse of underground voids. Cementing operations may plug or alter groundwater flow, potentially reducing the water quantity at springs and water wells. Inadequate subsurface cementing, casing, and cave/aquifer protection measures can lead to the migration of oil, gas, drilling fluids, and produced saltwater into cave systems and freshwater aquifers. Production facilities such as tank batteries, pump-jacks, compressors, transfer stations, and pipe may fail and allow contaminants to enter caves and freshwater systems. Downhole casing and cementing failures can allow migration of fluids and/or gas between formations and aquifers. Facilities may also be subject to slow subsidence or sudden collapse of the underlying bedrock.

Any industrial activities that take place upon or within karst terranes or freshwater aquifer zones have the potential to create both short-term and long-term negative impacts to freshwater aquifers and cave systems. While a number of mitigation measures can be implemented to mitigate many impacts, it is still possible for impacts to occur from containment failures, well blowouts, accidents, spills, and structural collapses. It is therefore necessary to determine if current mitigations measures are sufficient enough to prevent long-term or cumulative impacts in order to prevent degradation unnecessary to, or undue in proportion to, the proposed mineral projects.

c. Other Resources

BLM must also take a hard look at impacts to other resources. For example, BLM must analyze foreseeable impacts to cultural and heritage resources, wilderness study areas and lands with wilderness characteristics, areas of critical environmental concern (ACECs), and special status species. BLM must also take a hard look at impacts to other resources, including endangered species.

d. BLM Must Analyze Impacts to State and Local Economies

BLM must also take a hard look at the economic impacts of the proposed lease sale on state and local economies. One measure of this impact is the growth and quality of oil and gas extraction ("OGE") jobs.

Job growth in the oil and gas industry has stalled. Although oil and gas extraction recently reached peak levels, OGE employment is beginning to lag behind production.[145] In New

[144] See **Exhibit 115,** Anthony H. Cooper, et al., *Dealing With Gypsum Karst Problems: Hazards, Environmental Issues And Planning*, TREATISE ON GEOMORPHOLOGY 451 (6th, 2013).
[145] **Exhibit 119**, *See, e.g.*, Rebecca F. Elliot, *Why Oil Industry Jobs are Down, Even with Production Up*, New York Times, (Jan. 14, 2025), https://www.nytimes.com/2025/01/14/business/energy-environment/oil-gas-jobs.html ("[C]ompanies that extract, transport and process these fossil fuels employ roughly 25 percent fewer workers than they did a decade earlier. . . [producing] less fuel."); **Exhibit 120**, s*ee also* Megan Milliken Biven & Leo Lindner,

Mexico, for example, technological advances have led to a 50-700% increase in the production of natural gas and crude oil, while jobs remained steady—or even decreased—relative to production.[146] Jobs in the oil and gas industry are also precarious due to the industry's major boom-and-bust cycles. [147] Furthermore, OGE jobs have been outpaced in recent years by gains in renewable energy industries.[148] Policy changes under the Trump administration—including measures to increase leasing—may negatively impact job growth across the energy sector as a whole.

BLM must also consider the quality of oil and gas extraction jobs, and the impacts of lease sale on OGE workers. General statements that OGE jobs are well paying and provide good benefits fail to account for local variances or the health and safety consequences that come with those benefits. For example, while a national level survey reported that 56% of OGE workers received retirement benefits, in New Mexico that figure is only 21%.[149] Similarly, for health insurance, 74% of workers surveyed nationally received health insurance; in New Mexico this figure was only 43%.[150] Additionally, while many OGE workers have access to higher wages, these higher wages are the result of dangerous work conditions and long hours—a tradeoff rarely considered in research.[151] Moreover, most discussions ignore the sizeable portion of workers who work long hours in dangerous conditions without receiving high pay.[152] Something also not accounted for is the emerging trend of companies increasingly using 1099 independent contractors instead of W-2 employees which is likely to depress industry wages and benefits.[153] Lastly, OGE workers are disproportionately at risk of heat-related illnesses and injuries and these risks will increase as the effects of climate change worsen.

Finally, BLM may not blindly assert that OGE jobs will have spillover, positive effects on local economies. Although some research appears to support this, it varies based on region

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The American Oil & Gas Worker Survey, True Transition, at 6 (Mar. 2023) [hereinafter True Transition], https://www.truetransition.org/_files/ugd/0ad80c_069ea867b3f044afba4dae2a1da8d737.pdf?index=true ("Workers complained that current trends places [sic] greater pressure on remaining, smaller crews and compounds the risk each worker must face each shift."). This is likely due to increases in efficiency, particularly from technological advances. *Id.*

[146] **Exhibit 121**, Rachel Moskowitz, *A Profile of Oil and Natural Gas Workers in New Mexico*, Labor Market Rev., 8 (Feb. 2022), https://www.dws.state.nm.us/Portals/0/DM/LMI/Oil_NaturalGas_Workers_NM.pdf.

[147] True Transition at 24, Exhibit 120. While the COVID-19 pandemic led to massive OGE industry layoffs, many workers reported this was not the first time they were laid off. *Id.*

[148] Dep't Energy Off. Energy Jobs, United States Energy & Employment Report 2024, at xi, xxvi (2024). Gains in renewable industries were nearly twice those in the energy sector as a whole. *Id*.

[149] *Compare* N.M. Workforce Study at 16, Exhibit 121, *with* True Transition at 29, Exhibit 120.

[150] True Transition at 29, Exhibit 120; N.M. Workforce Study at 16, Exhibit 121. These disparities may be explained by the number of immigrant workers or 1099 workers employed in a particular location because they do not have access to the same benefits.

[151] N.M. Workforce Study at 36, Exhibit 121, (finding that many workers with good salaries worked twelve-hour days).

[152] *See id.* (finding nearly a quarter of workers surveyed made less than $25,000 a year).

[153] *See* True Transition at 5, Exhibit 120 (noting about 25% of respondents were independent contractors).

and production levels.[154] BLM must consider and address these varied results, in addition to the impact that job growth and job quality will have on state and local economies.

e. BLM's Analysis of the Impacts of Produced Water and Oil and Gas Waste is Inadequate.

Produced water is a term used in the oil and gas industry to refer to the incidental flowback wastewater that comes out of a well during the oil and gas production process.[155] As the main waste stream arising from oil and gas development, which is typically heavily contaminated with multiple hazardous substances and must be disposed of carefully. As a potential significant source of environmental impacts to air, groundwater, surface water, and public health, the BLM must take a hard look at the impacts of produced water in particular.

Like oil and gas, water exists naturally underground. Depending on the chemistry of the rocks, it may contain many different chemical constituents, including mineral salts, organic compounds, heavy metals, naturally occurring radioactive materials, critical minerals, and other minerals. When it flows back to the surface during oil and gas production the water will contain hydrocarbons as well as naturally occurring toxic substances like arsenic and radium,[156] salts and a mixture of non-disclosed chemical additives injected into the well to facilitate extraction. These additives can include carcinogens and numerous other toxic substances that have the potential to harm human health and contaminate the environment. The content and toxicity of produced water vary considerably, depending on the geology of the petroleum deposit.

Produced water is the largest waste stream from fossil fuel extraction.[157] Methods to extract fuels from aging oil fields and unconventional, or fracked, shale formations typically require far more water than conventional operations. Oil and gas operators recycle some of their wastewater to extract more fuels, but some operations require freshwater. Produced water is generated wherever oil and gas is extracted. Depending on factors such as the level of contamination and the availability of water treatment options, some produced water may return to the drilling production cycle. The preferred method for industry to dispose of excess produced water is the injection of the waste into injection wells and saltwater disposal wells ("SWDs"),[158] which have been linked with induced seismicity.[159] Other than injection disposal, operators may seek to treat and reuse produced water outside the oilfields.[160] Produced water may be piped to

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[154] *See e.g.* **Exhibit 122,** Zhengyu Cai, *Who Benefits from Local Oil and Gas Employment? Labor Market Composition in the Oil and Gas Industry in Texas,* Institute of Labor Econ., 7–8, 30–33 (2019) (discussing results from study on indirect impacts and summarizing other studies with varied results on impact).
[155] **Exhibit 123,** U.S. DOE, *Produced Water from Oil and Gas Development and Critical Minerals* (June 2024).
[156] *See*, *id.* (discussion of TNORM and threats from radioactivity associated with oil and gas development).
[157] **Exhibit 124,** Molly C McLaughlin, et al., *Water quality assessment downstream of oil and gas produced water discharges intended for beneficial reuse in arid regions*, 15 SCI. TOTAL ENV. 136607 (2020).
[158] *See* **Exhibit 125,** Casee R. Lemons, et al., Spatiotemporal and stratigraphic trends in salt-water disposal practices of the Permian Basin, Texas and New Mexico, United States, 26 ENV. GEOSCI. 107 (2019).
[159] **Exhibit 126,** U.S. EPA, *Distribution of Final Work Product from the National Underground Injection Control (UIC) Technical Workgroup- Minimizing and Managing Potential Impacts of Injection Induced Seismicity from Class II Disposal Wells: Practical Approaches* (Feb. 6, 2015).
[160] **Exhibit 127,** Ground Water Protection Council, *U.S. Produced Water Volumes and Management Practices* (2021). *See also* **Exhibit 128,** Scanlon et al., *Can we beneficially reuse produced water from oil and gas extraction in the U.S.?* 717 SCI. OF THE TOTAL ENV'T 137085 (2020).

disposal locations or alternatively transported by truck and/or rail. BLM must analyze the environmental impacts of produced water disposal, including transportation and storage of produced water, treatment for proposed reuse including associated air emissions, the potential for induced seismicity, potential for spills and leaks of produced water and concomitant hazardous substances, and ultimate disposal methods.

f. BLM's Analysis of Uncertainty is Inadequate.

BLM's consideration of uncertainty in the Draft EA is inadequate. The Draft EA mentions uncertainty—for example in the context of factors that may affect actual GHG emissions and associated impacts but fails to fully analyze the uncertainty. The 2022 BLM Specialist Report also identifies countless areas of uncertainty regarding the analysis of GHGs and climate change, including:

- [Global warming potentials] have a large uncertainty: ±26 percent and ±11 percent for the 20-year and 100-year CH_4 GWPs, respectively, and ±118 percent and ±130 percent for the 20-year and 100-year N_2O GWPs, respectively.[161]
- The earth's climate system is complex and interwoven in ways that are not yet fully understood. There are several known climate feedback mechanisms that add uncertainty in terms of timing (fast and slow feedbacks) and overall sensitivity within the evaluation of the climate system.[162]
- As with the forcing components, there are also positive and negative feedback mechanisms, and there is a relatively large range of uncertainty concerning estimates of the climate sensitivity that leaves the subject open to further investigation.[163]
- Melting glaciers are likely to produce uncertainties for hydrologic power generation, which is an important resource in Alaska.[164]
- Analysis by IPCC scientists in AR6 suggest the 1.5°C temperature target is likely to be exceeded by 2030, which is in line with the carbon budget estimates. These estimates contain uncertainties that are characteristic of scientists' current understanding of the earth's climate-influencing systems, such as feedbacks and the forcing and response associated with the non-CO2 GHG species, and historical emissions accounting. The uncertainty range associated with the latest estimates is approximately ±400 Gt CO2.[165]
- As expected with such a complex model, there are multiple sources of uncertainty inherent in the SC-GHG estimates. Some sources of uncertainty relate to physical effects of GHG emissions, human behavior, future population growth and economic changes, and potential adaptation.

Well-documented scientific research and BLM's own analysis demonstrate that the potential effects of climate change are highly uncertain and involve unique and unknown risks.

[161] 2022 BLM Specialist Report at Section 8.5.
[162] *Id.* at Section 8.2.
[163] *Id.*
[164] *Id.* at Section 8.4.
[165] *Id.* at Section 9.1.

BLM must properly address this NEPA intensity factor in light of these impacts, and we request BLM do so for all 2026 lease sales in a single EIS.

g. BLM's Analysis of Controversy Over Impacts from GHG is Absent.

BLM's omission of the intensity factor of controversy in the Draft EA is improper. As the global body of scientific research and understanding of climate change reflects, there is controversy concerning critical aspects of the nature and effect of GHG emissions and their impact on climate change. This controversy is exemplified by the BLM's conclusions that the emissions from the proposed lease sale and the cumulative emissions from the federal fossil fuel program are not significant as compared to a robust scientific literature, indicating current and foreseeable fossil fuel development is not aligned with GHG reductions necessary to prevent warming exceeding 1.5°C.[166] We request BLM address the NEPA intensity factor for controversy and do so for all 2025 lease sales in a single EIS.

h. BLM's Analysis of State Law and Policy is Insufficient.

BLM must analyze the potential for conflict between state laws and policies that set GHG emission reduction targets or commitments and the authorization of the proposed leases. Both Colorado and New Mexico, for example, have statutes and executive orders setting emission reduction goals. In Colorado, HB19-1261 requires the state to reduce GHG emissions by at least 26 percent in 2025, at least 50 percent by 2030, and at least 90 percent by 2050, relative to 2005 pollution levels. In New Mexico, Executive Order 2019-003 declares the state's support of the 2015 Paris Agreement goals and orders the state to achieve statewide reduction of GHG emissions of at least 45% by 2030, relative to 2005 levels. BLM's EA for this proposed lease sale must discuss and evaluate how the proposed lease sale and its estimated GHG emissions may threaten violation of these state laws and policies.

i. BLM Must Analyze Leasing Stage Commitments and Timing of NEPA Review.

Issuance of federal oil and gas leases constitutes a commitment of public resources that materially constrains BLM's future discretion by conveying valid existing rights under the Mineral Leasing Act and foreclosing landscape level alternatives such as no leasing or broad deferral. Although BLM retains authority to condition or deny individual APDs, that retained discretion does not eliminate the agency's obligation to evaluate reasonably foreseeable environmental impacts before leasing, where the decision itself commits federal minerals to potential development. Accordingly, BLM may not rely solely on generalized assurances of future, site-specific review to support a finding of no significant impact where the environmental consequences of leasing are reasonably foreseeable at this stage.

II. Federal Land and Policy Management Act (FLPMA)

[166] *See*, *e.g*. The Production Gap Reports, Exhibits 1 & 24.

A. Leasing New Federal Fossil Fuels for Development Would Cause Unnecessary and Undue Degradation That Is Prohibited Under FLPMA.

The Federal Land Policy and Management Act ("FLPMA"), 43 U.S.C. § 1701 *et seq.*, directs that "the public lands be managed in a manner that will protect the quality of [critical resource] values; that, where appropriate, will preserve and protect certain public lands in their natural condition; that will provide food and habitat for fish and wildlife and domestic animals; and that will provide for outdoor recreation and human occupancy and use." 43 U.S.C. § 1701(a)(8). This substantive mandate requires that BLM not elevate the development of oil and gas resources above other critical resource values in the planning area. FLPMA instead requires that where oil and gas development would threaten the quality of critical resources, conservation of these resources should be the preeminent goal.

Here, the actions that BLM must determine meet the substantive requirements of FLPMA as outlined above include: (1) the programmatic resumption of oil and gas leasing on federal lands; and (2) the decision of whether to offer to sell and issue oil and gas leases on each of the specific parcels identified. Critically, however, BLM's consideration of these substantive requirements must not be viewed in the abstract, but within the specific context of the agency's analysis and the scientific information available to it. Accordingly, and of foundational importance, is the question of whether the continued leasing and development of oil and gas will result in unnecessary and undue degradation to lands, resources, and species as a result of climate impacts.

As discussed above, BLM has endeavored to satisfy the requirement to consider the cumulative climate impacts of its leasing decisions by preparing the 2020 and 2021 Specialist Reports. Setting aside the deficiencies of the Specialist Report, discussed above, the underlying conclusions are chilling. BLM must apply this analysis to its substantive duty to avoid unnecessary and undue degradation under FLPMA. 43 U.S.C. § 1732(b). BLM's failure to specifically account for unnecessary and undue degradation in its decision to continue the leasing and development of oil and gas—which is distinct from its compliance under NEPA—is actionable on procedural grounds and must occur before the leasing decision is approved.

BLM must define what constitutes "unnecessary or undue degradation" in the context of continued oil and gas leasing and development, either at a programmatic level or within these specific sales—and with particular consideration of greenhouse gas emissions and resulting climate impacts—and explain why its chosen alternative will not result in such degradation, as required by FLPMA, 43 U.S.C. § 1732(b).

B. BLM is Required by FLPMA to Take Every Opportunity to Reduce Methane Emissions from Mineral Production on Federal Lands.

As discussed above, methane represents an opportunity for BLM to meaningfully reduce GHG emissions associated with the federal oil and gas program. BLM is not only required to analyze alternatives that address this highly potent short-term GHG, it also has substantive mandates under FLPMA to prevent, reduce, or mitigate methane emissions, independent of the agency's MLA duty to prevent waste.

FLPMA's statutory directives enable Interior to take action before lease rights are conferred, whether at the planning or leasing stages, that will eliminate methane emissions and otherwise protect public lands. That includes the authority *and responsibility* to (1) reduce acres available for leasing to address the contribution of methane emissions to the climate crisis and the impacts of the crisis to public lands, (2) attach methane and other harmful emission reduction stipulations to an oil and gas lease to protect air and atmospheric resources and to mitigate climate impacts to public lands, and (3) condition lease development at the permitting stage. *See* 43 C.F.R. § 3101.1-2. In the absence of existing methane waste and air quality regulations, and even following the conclusion of current EPA and BLM rulemaking efforts with regard to methane, BLM has a duty to leverage its considerable authority under FLPMA to the fullest extent permitted by law, including by identifying stipulations and conditions of approval for *all* of the proposed 2026 lease sales, to minimize, reduce, and mitigate methane impacts to the greatest extent possible.

C. BLM May Not Arbitrarily Assume the Potential Benefits of Leasing Outweigh the Social and Environmental Costs.

BLM fails to justify its decision to proceed with this lease sale, despite the enormous associated social and environmental costs. Offering hundreds of leases that will impose billions of dollars in social and environmental harms without offering any justification for such a decision is inconsistent with FLPMA.

D. The BLM must address whether and how the Congressional Review Act affects the validity of the governing Field Office RMPs.

Under FLPMA, the BLM decisions such as leases, permits, rights of way, and other authorizations must be issued "in accordance with" a valid land use plan. 43 U.S.C. § 1732(a). FLPMA's implementing regulations likewise provide that all "resource management authorizations and actions . . . shall conform to the approved [RMP]." 43 C.F.R. § 1610.5-3(a). Necessarily, BLM cannot issue new leases or authorizations or otherwise take actions predicated on a plan that was not validly approved before it was put into effect. Such action would violate FLPMA, the recently enacted 2025 Reconciliation Act[167] (and the Mineral Leasing Act (MLA), 30 U.S.C. §§ 181-287, which it amended), and the Administrative Procedure Act's (APA's), prohibition against agency action that is arbitrary and capricious or not in accordance with law, 5 U.S.C. §§ 551-559.

The Congressional Review Act (CRA) requires federal agencies to submit rules to Congress for review before they can take effect. 5 U.S.C. § 801(a)(1)(A). Historically, land management agencies like the BLM have not submitted their land or resource management plans to Congress, taking the position that such plans are not "rules" for CRA purposes. However, after the Government Accountability Office (GAO) determined, at the request of members of

[167] Pub. L. No. 119-21, § 50101(c)(2)(A), 129 Stat. 72, 138 (2025) ("[The BLM] shall offer . . . parcels . . . *under the applicable resource management plan in effect*" (emphasis added)); *id.* at 138–39 (directing that certain lands meeting certain conditions be made available for leasing "if the Secretary determines that the parcel of land is open to oil or gas leasing *under the approved resource management plan applicable to the planning area in which the parcel of land is located that is in effect*" (emphasis added)); *id.* at 139 (explaining that issued leases "shall be subject to the terms and conditions of the *approved resource management plan*" (emphasis added)).

Congress, that three BLM RMPs *were* "rules" for purposes of the CRA,[168] Congress voted in October 2025 to disapprove those three RMPs under the terms of the CRA, subjecting such plans to the CRA's procedural requirements for the first time.[169] Following this legislative action, some stakeholders have questioned whether land or resource plans or amendments approved after passage of the CRA in 1996 are in effect if they have not been submitted to Congress pursuant to the CRA. *See* 5 U.S.C. § 801(a)(1)(A).

The BLM must address these questions before proceeding with this lease sale. The RMPs associated with this proposed lease sale were all implemented after 1996. Since then, the BLM has not transmitted any of those RMPs to Congress under the CRA. Before proceeding with this lease sale BLM must address the impact of the CRA on the validity of the RMPs and how this sale is consistent with FLPMA, the 2025 Reconciliation Act, and the MLA.

E. Even assuming the RMPs are valid and in effect, BLM must evaluate whether they are inadequate to support leasing.

RMPs may grant the BLM authority to lease in certain areas. *See* 30 U.S.C. § 226(b)(1)(A); 43 C.F.R. § 3120.1-2(a). Before issuing leases, however, the agency must confirm that the applicable RMP is up to date and that the underlying environmental analysis will support a contemporary leasing decision. If an RMP is more than five years old, the BLM must reevaluate and confirm that the analysis and any underlying assumptions remain valid. *See* 42 U.S.C. § 4336b. An RMP would no longer support a new leasing decision if important new data, policies, or changed circumstances exist (such as changes in the law) that were not considered when it was approved. *See* H-1601-1 — LAND USE PLANNING HANDBOOK, SECTION VII.C, DETERMINING WHEN IT IS NECESSARY TO REVISE AN RMP; 43 C.F.R. § 1610.5-6. If an RMP is too old or stale to support a new leasing decision, the BLM must revise the RMP or undertake a new, thorough environmental analysis to support new leasing, such as an EIS.

Furthermore, Greater Sage-Grouse RMP Amendment relies on additional analysis at the lease sale or permitting stage, leaving the agency discretion to make decisions on whether to offer lands for lease and under what conditions. The plan amendment assumes additional density and disturbance impacts will be considered prior to authorizing development, which must be considered here. The underlying intent of the RMPA was to utilize the mitigation hierarchy to prioritize 1) avoiding, 2) minimizing, and 3) mitigating impacts to high priority wildlife. Given the importance of high priority habitat across the state, and the preference criteria established in

[168] U.S. Gov't Accountability Off., *Applicability of the Congressional Review Act to Central Yukon Record of Decision and Approved Resource Management Plan*, B-337200, at 5–6 (June 25, 2025); *accord* U.S. Gov't Accountability Off., *Applicability of the Congressional Review Act to North Dakota Field Office Record of Decision and Approved Resource Management Plan*, B-337175 (June 25, 2025); U.S. Gov't Accountability Off., *Applicability of the Congressional Review Act to Miles City Field Office Record of Decision and Approved Resource Management Plan Amendment*, B-337163 (June 25, 2025).

[169] H.J. Res. 104, 119th Cong. (2025) (providing for CRA disapproval of the Miles City Field Office Record of Decision and Approved Resource Management Plan Amendment); H.J. Res. 105, 119th Cong. (2025) (providing for CRA disapproval of North Dakota Field Office Record of Decision and Approved Resource Management Plan); H.J. Res. 106, 119th Cong. (2025) (providing for CRA disapproval of Central Yukon Record of Decision and Approved Resource Management Plan).

the current oil and gas leasing regulations, the BLM can and should defer leasing in these parcels to prioritize leasing outside of important wildlife habitats. Absent deferral, BLM must fully analyze and disclose impacts or apply full No Surface Occupancy (NSO) stipulations to ensure significant impacts do not occur from the proposed decision.

Even where implicated RMPs were finalized within the last five years, the BLM must take a hard look at new resource inventories and stipulations to ensure that new leases comply with existing plans, reflect updated inventory data, and adequately protect sensitive resources. Failure to consider, analyze, and disclose these issues violates NEPA and FLPMA.

To the extent that BLM proceeds to sell the proposed parcels without deferral or additional analysis, the agency must attach full NSO stipulations to the leases to avoid making an irreversible and irretrievable commitment of resources as discussed in the "hard look" sections below.

F. The Trump Administration's energy dominance agenda cannot override the BLM's statutory obligations under FLPMA.

Under FLPMA, the BLM must manage public lands according to "multiple use" and "sustained yield" and "in a manner that will protect the quality of scientific, scenic, historical, ecological, environmental, air and atmospheric, water resources, and archeological values." 43 U.S.C. §§ 1701(a)(7) & (8), 1712(c)(1), 1732(a). Multiple use obligates the agency to make the "most judicious use" of public lands and their resources to "best meet the present and future needs of the American people." *Id.* § 1702(c). This requires taking "into account the long-term needs of future generations," ensuring "harmonious and coordinated management of the various resources without permanent impairment of the productivity of the land and the quality of the environment." *Id.* Sustained yield mandates "achiev[ing] and maint[aining] in perpetuity . . . a high-level annual or regular periodic output of the various *renewable* resources of the public lands consistent with multiple use." *Id.* § 1702(h) (emphasis added). The BLM must "take any action necessary to prevent unnecessary and undue degradation of the lands." *Id.* § 1732(b). "It is past doubt that the principle of multiple use does not require BLM to prioritize development over other uses. . . . Development is a possible use, which BLM *must* weigh against other possible uses including conservation to protect environmental values. . . ." *New Mexico ex rel. Richardson v. BLM*, 565 F.3d 683, 710 (10th Cir. 2009) (emphasis added).

The BLM is therefore not obligated to lease any *specific* parcel of public land for oil and gas development. The agency must retain the authority to defer lease sale parcels, even after bidding has concluded.[171] Where conflicts exist, the agency cannot simply invoke one aspect of multiple use—mineral development based on an alleged national energy emergency—as a magic talisman to ignore other principal uses and the multiple use requirement. Moreover, where conflicts with other uses exist, the agency must affirmatively evaluate deferral of parcels in its alternatives analysis under NEPA.

G. New Leasing Locks in Permanent Impairment of Land Productivity and Future Uses

Leasing federal minerals for oil and gas development commits public lands to decades of extraction, infrastructure build-out, and associated greenhouse gas emissions that cannot be meaningfully reversed once development proceeds. This lock-in effect constitutes permanent impairment of land productivity and environmental quality within the meaning of FLPMA, particularly where future land uses, wildlife habitat connectivity, air quality, and water resources are foreclosed or substantially constrained. BLM must evaluate whether authorizing new leases—given existing leased but undeveloped acreage—would result in unnecessary or undue degradation and permanent impairment, independent of downstream combustion emissions and separate from NEPA's procedural requirements.

III. Endangered Species Act (ESA)

A. Greenhouse Gas Emissions Have Direct, Predictable, and Devastating Effects on Endangered Species and Habitats.

The science is overwhelmingly clear that climate change represents a stark threat to the future of biodiversity within the United States and around the world. The Fifth National Climate Assessment warns that "that "the effects of human-caused climate change are already far-reaching and worsening across every region of the United States."[170] The best available science shows that anthropogenic climate change is causing widespread harm to life across the planet, disrupting species' distribution, timing of breeding and migration, physiology, vital rates, and genetics—in addition to increasing species extinction risk.[171] Climate change is already affecting 82% of key ecological processes that underpin ecosystem function and support basic human needs.[172] Climate change-related local extinctions are widespread and have occurred in hundreds of species, including almost half of the 976 species surveyed.[173] Nearly half of terrestrial non-flying threatened mammals and nearly one-quarter of threatened birds are estimated to have been negatively impacted by climate change in at least part of their range.[174] Furthermore, across the globe, populations of terrestrial birds and mammals that are experiencing greater rates of climate warming are more likely to be declining at a faster rate.[175] Genes are changing, species' physiology and physical features such as body size are changing, species are moving to try to

[170] **Exhibit 130,** U.S. Global Change Research Program, *Fifth National Climate Assessment,* (2023), https://nca2023.globalchange.gov.
[171] **Exhibit 131,** Rachel Warren et al., *Increasing impacts of climate change upon ecosystems with increasing global mean temperature rise*, 106 CLIMATIC CHANGE 141 (2011).
[172] **Exhibit 132,** Brett R. Scheffers*, The broad footprint of climate change from genes to biomes to people,* 354 SCIENCE 719 (2016).
[173] **Exhibit 133,** John J. Wiens, *Climate-related local extinctions are already widespread among plant and animal species*, 14 PLoS Biology e2001104 (2016).
[174] **Exhibit 134,** Michela Pacifici et al., *Species' traits influenced their response to recent climate change*, 7 Nature Climate Change 205 (2017). The study concluded that "populations of large numbers of threatened species are likely to be already affected by climate change, and … conservation managers, planners and policy makers must take this into account in efforts to safeguard the future of biodiversity."
[175] **Exhibit 135,** Fiona E.B. Spooner et al., *Rapid warming is associated with population decline among terrestrial birds and mammals globally*, 24 GLOBAL CHANGE BIO. 4521 (2018).

keep pace with suitable climate space, species are shifting their timing of breeding and migration, and entire ecosystems are under stress.[176]

Species extinction risk will accelerate with continued greenhouse gas pollution. One million animal and plant species are now threatened with extinction, with climate change as a primary driver.[177] At 2°C compared with 1.5°C of temperature rise, species' extinction risk will increase dramatically, leading to a doubling of the number of vertebrate and plant species losing more than half their range, and a tripling for invertebrate species.[178] Numerous studies have projected catastrophic species losses during this century if climate change continues unabated: 15 to 37% of the world's plants and animals committed to extinction by 2050 under a mid-level emissions scenario[179]; the potential extinction of 10 to 14% of species by 2100[180]; global extinction of 5% of species with 2°C of warming and 16% of species with business-as-usual warming[181]; the loss of more than half of the present climatic range for 58% of plants and 35% of animals by the 2080s under the current emissions pathway, in a sample of 48,786 species[182]; and the loss of a third or more of animals and plant species in the next 50 years.[183]

Methane emissions are particularly alarming. Immediate, deep reductions in methane emissions are critical for lowering the rate of global warming in the near-term, preventing the crossing of irreversible planetary tipping points, and avoiding harms to species and ecosystems from methane's intensive near-term heating effects and ground-level ozone production.[184]

IV. One Big Beautiful Budget Act (OBBBA)

The recently enacted OBBBA, Pub. L. No. 119-21, fundamentally alters the legal landscape governing federal oil and gas leasing in ways that heighten, rather than diminish, BLM's obligations to conduct thorough environmental review before proceeding with this sale.

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[176] **Exhibit 136,** Camille Parmesan & Gary Yohe, *A globally coherent fingerprint of climate change impacts across natural systems*, 421 NATURE 37 (2003); **Exhibit 137,** Terry L. Root et al., *Fingerprints of global warming on wild animals and plants*, 421 NATURE 57 (2003); Camille Parmesan, *Ecological and evolutionary responses to recent climate change*, 37 ANNUAL REVIEW OF ECOLOGY EVOLUTION AND SYSTEMATICS 637 (2006), Exhibit 182; **Exhibit 138,** I-Ching Chen et al., *Rapid range shifts of species associated with high levels of climate warming*, 333 SCIENCE 1024 (2011); **Exhibit 139,** Ilya M. D. Maclean & Robert J. Wilson, *Recent ecological responses to climate change support predictions of high extinction risk*, 108 PNAS 12337 (2011); *Increasing impacts of climate change upon ecosystems with increasing global mean temperature rise*, Exhibit 134; **Exhibit 140,** Abigail E. Cahill et al., *How does climate change cause extinction?*, 280 PROCEEDINGS OF THE ROYAL SOCIETY B 20121890 (2012).

[177] **Exhibit 141,** IPBES, Global Assessment Report on Biodiversity and Ecosystem Services (E.S. Brondízio et al eds., 2019), https://ipbes.net/news/Media-Release-Global-Assessment.

[178] Intergovernmental Panel on Climate Change, *Summary for Policymakers,* in Climate Change 2021: The Physical Science Basis. Contribution of Working Group I to the Sixth Assessment Report of the Intergovernmental Panel on Climate Change (V. Masson-Delmotte et al eds., 2021), https://www.ipcc.ch/report/ar6/wg1/, Exhibit 22.

[179] **Exhibit 142,** Chris D. Thomas et al., *Extinction risk from climate change*, 427 NATURE 145 (2004).

[180] *Recent ecological responses to climate change support predictions of high extinction risk*, Exhibit 143.

[181] **Exhibit 143,** Mark C. Urban, *Accelerating extinction risk from climate change*, 348 SCIENCE 571 (2015).

[182] **Exhibit 144,** Rachel Warren et al., *Quantifying the benefit of early climate change mitigation in avoiding biodiversity loss*, 3 NATURE CLIMATE CHANGE 678 (2013).

[183] **Exhibit 145,** Cristian Román-Palacios & John J. Wiens, *Recent responses to climate change reveal the drivers of species extinction and survival*, 117 PNAS 4211 (2020).

[184] **Exhibit 146,** United Nations Environment Programme & Climate and Clean Air Coalition, *Global Methane Assessment: Benefits and Costs of Mitigating Methane Emissions* 11 (2021), https://www.unep.org/resources/report/global-methane-assessment-benefits-and-costs-mitigating-methane-emissions.

As amended by OBBBA, Section 17 of the Mineral Leasing Act now directs that leases "shall be subject to the terms and conditions of the approved resource management plan" and "may not require any stipulations or mitigation requirements not included in the approved resource management plan." *See* Pub. L. No. 119-21, § 50101(d)(1)(a)(2)(A). In other words, OBBBA strips BLM of the sale-specific discretion it has historically exercised to impose protective stipulations as conditions of individual lease sales. Under the prior statutory regime, BLM could and routinely did use such lease-level stipulations to address resource conflicts identified during NEPA review. That safety valve is now closed: the RMP is the ceiling, not a floor, for lease terms and conditions.

This structural change has direct and critical implications for the adequacy of existing RMPs as a legal predicate for leasing. Because BLM can no longer cure resource conflicts or environmental deficiencies through sale-specific stipulations, the burden of ensuring that leasing will not cause unnecessary and undue degradation, as FLPMA requires, falls entirely on the RMP itself. An RMP that assumed BLM retained later discretion to impose protective conditions can no longer serve as an adequate legal foundation for leasing decisions made under OBBBA's constrained framework. This is analogous to the need, described above, for a programmatic EIS: just as the incremental and cumulative nature of the climate crisis compels a comprehensive programmatic analysis rather than piecemeal lease-level review, OBBBA's elimination of lease-level mitigation discretion compels a comprehensive RMP revision before any additional leasing proceeds. BLM cannot simply tier to stale RMPs that were developed under a different statutory framework and then disclaim responsibility for impacts it can no longer address at the leasing stage.

Accordingly, before proceeding with this sale, BLM must revisit and, where necessary, revise the applicable RMPs to ensure they affirmatively incorporate the full suite of protective stipulations and mitigation measures that can no longer be imposed on a sale-by-sale basis. OBBBA further provides that "[t]he initiation of an amendment to an approved resource management plan shall not prevent or delay the Secretary from making the applicable parcel of land available for leasing," Pub. L. No. 119-21, § 50101(d)(1)(a)(2)(B), but this provision cannot be read to authorize leasing predicated on an RMP that is facially inadequate to support a lawful leasing decision under either FLPMA or NEPA. To do otherwise would be to proceed with leasing based on plans that were never designed to bear the full legal weight OBBBA now places upon them, an arbitrary and capricious result that cannot withstand scrutiny under the APA. *See* 5 U.S.C. § 706(2)(A).

V. Conclusion

Prior to any decision to conduct new leasing of federal public lands for fluid mineral development, BLM must comply with its obligations under the National Environmental Policy Act, the Federal Land Policy and Management Act, and the Endangered Species Act, to consider the impacts of its nationwide policy with respect to federal fossil fuel production on resources including global climate, environmental justice, health, wildlife habitat, air quality, and surface and groundwater quality. BLM's current plan- and lease-level NEPA compliance cannot support a decision to lawfully engage in new leasing, and therefore all new leasing must be deferred until BLM prepares a comprehensive environmental review, including an analysis of the cumulative

impacts of past, ongoing, and reasonably foreseeable fossil fuel development. In order to comply with the United States' legal and moral obligations to its citizens, and to future generations, that review must include meaningful consideration of alternatives that could allow the Department of Interior to fulfill its role in putting the nation on a path towards an emissions future compatible with limiting warming to 1.5°C and mitigating the worst effects of global climate change. The Commenters appreciate your consideration of the information and concerns addressed in this letter, as well as the information included in the attached exhibits, sent under separate cover.

Should you have any questions, please do not hesitate to contact me.

Sincerely,

/s/ Morgan O'Grady

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On behalf of the organizations identified above.

U.S. Bureau of Land Management
New Mexico State Office
Attn: State Director
Attn: Catherine Brewster
301 Dinosaur Trail
Santa Fe, NM 87508

U.S. Bureau of Land Management
Farmington Field Office
Attn: ajennings@blm.gov
6251 College Blvd. A
Farmington, NM 87402

U.S. Bureau of Land Management
Pecos District Office
Attn: Catherine Brewster
2909 West Second Street
Roswell, NM 88201-2019

U.S. Bureau of Land Management
Wyoming State Office
5353 Yellowstone Rd
Cheyenne, WY 82009

Via Eplanning

Re: Protest Comments for the New Mexico and Wyoming Q2 2026 Oil and Gas Lease Parcel Sales (DOI-BLM-NM-F010-2026-0001-EA, DOI-BLM-NM-P000-2026-0001-EA, DOI-BLM-WY-0000-2026-0001-EA)

Appendix A

BUREAU OF LAND MANAGEMENT

NEW MEXICO STATE OFFICE

MAY 20, 2026

STATISTICS BY STATE

STATE	PARCELS	ACRES
NEW MEXICO	73	33374.22
TEXAS	1	155.64
TOTALS	74	33529.86

Parcels

New Mexico

NM-2026-05-0663
NMNM106788111

NM, Farmington Field Office, BLM, PD
T. 22 N., R. 6 W., New Mexico Principal
Sec. 30 E1/2SE1/4.
Sandoval County
80 Acres
Rental $240.00
12.50% Royalty Rate
Stipulations:
NM-13-CSU BLM Stipulation CSU for Paleontological Resources
FFO-BS-LN-41 BLM Lease Notice LN for Biological Survey
HQ-CR-1 BLM Lease Notice LN for Cultural Resource Protection
HQ-MLA-1 BLM Lease Notice LN for Notice to Lessee Concerning Mineral Leasing Act Section 2(a)(2)(A)
HQ-TES-1 BLM Lease Notice LN for Threatened and Endangered Species Act
NM-1-LN BLM Lease Notice LN for Potential, Suitable, and Occupied Habitat for Special Status Plant Species
NM-11-LN BLM Lease Notice LN for Special Cultural Resource
NM-14-LN BLM Lease Notice LN for Paleontological Resources
EOI #NM00020923

NM-2026-05-0664
NMNM106788112

NM, Farmington Field Office, BLM, PD
T. 23 N., R. 6 W., New Mexico Principal
Sec. 13 N1/2.
Rio Arriba County
320 Acres
Rental $960.00
12.50% Royalty Rate
Stipulations:
FFO-S15-CSU-46 BLM Stipulation CSU for Slopes Greater Than 15 Percent or 3 Feet Vertical Cuts
NM-13-CSU BLM Stipulation CSU for Paleontological Resources
FFO-BS-LN-41 BLM Lease Notice LN for Biological Survey
HQ-CR-1 BLM Lease Notice LN for Cultural Resource Protection
HQ-MLA-1 BLM Lease Notice LN for Notice to Lessee Concerning Mineral Leasing Act Section 2(a)(2)(A)
HQ-TES-1 BLM Lease Notice LN for Threatened and Endangered Species Act
NM-1-LN BLM Lease Notice LN for Potential, Suitable, and Occupied Habitat for Special Status Plant Species

NM-11-LN BLM Lease Notice LN for Special Cultural Resource
NM-14-LN BLM Lease Notice LN for Paleontological Resources
FFO-CVTCP-NSO-39 BLM Stipulation NSO for Cultural Values and Traditional Cultural Properties
FFO-BGWR-TL-4 BLM Stipulation TL for Big Game Winter Range Wildlife Habitat
EOI #NM00020923

NM-2026-05-0411
NMNM106788113

NM, Farmington Field Office, BLM, PD
T. 22 N., R. 7 W., New Mexico Principal
Sec. 19 LOTS 1,2;
Sec. 19 E1/2NW1/4.
Sandoval County
162.16 Acres
Rental $489.00
12.50% Royalty Rate
Stipulations:
FFO-S15-CSU-46 BLM Stipulation CSU for Slopes Greater Than 15 Percent or 3 Feet Vertical Cuts
FFO-VRM3-CSU-7 BLM Stipulation CSU for Class III Visual Resource Management
NM-13-CSU BLM Stipulation CSU for Paleontological Resources
FFO-BS-LN-41 BLM Lease Notice LN for Biological Survey
HQ-CR-1 BLM Lease Notice LN for Cultural Resource Protection
HQ-MLA-1 BLM Lease Notice LN for Notice to Lessee Concerning Mineral Leasing Act Section 2(a)(2)(A)
HQ-TES-1 BLM Lease Notice LN for Threatened and Endangered Species Act
NM-1-LN BLM Lease Notice LN for Potential, Suitable, and Occupied Habitat for Special Status Plant Species
NM-11-LN BLM Lease Notice LN for Special Cultural Resource
NM-14-LN BLM Lease Notice LN for Paleontological Resources
EOI #NM00016873

NM-2026-05-0671
NMNM106788114

NM, Farmington Field Office, BLM, PD
T. 23 N., R. 8 W., New Mexico Principal
Sec. 33 SW1/4.
San Juan County
160 Acres
Rental $480.00
12.50% Royalty Rate
Agreements:
NMNM105303488 This parcel is fully committed to the Betonnie Tsosie Wash Unit Agreement (UA) NMNM135219X, effective October 1, 2014. The UA operator is DJR Operating, LLC. In accordance with the regulations in 43 CFR 3101.3-1, the successful bidder

is required to file evidence of having entered into an agreement with the UA operator for the development and operations of the subject lands under the terms and provisions of the approved UA. The successful bidder should immediately contact the Operator in order to join the UA, the Operator will give instructions about executing copies of the joinder agreement. Five duplicate originally signed copies of the joinder agreement must be furnished to the Bureau of Land Management Reservoir Management Group within 60 business days of the sale date. If more time is required, you must request an extension of time in which to comply. If not submitted within the time allowed, your bid may be subject to rejection.

Stipulations:

FFO-VRM3-CSU-7 BLM Stipulation CSU for Class III Visual Resource Management
NM-13-CSU BLM Stipulation CSU for Paleontological Resources
FFO-BS-LN-41 BLM Lease Notice LN for Biological Survey
HQ-CR-1 BLM Lease Notice LN for Cultural Resource Protection
HQ-MLA-1 BLM Lease Notice LN for Notice to Lessee Concerning Mineral Leasing Act Section 2(a)(2)(A)
HQ-TES-1 BLM Lease Notice LN for Threatened and Endangered Species Act
NM-1-LN BLM Lease Notice LN for Potential, Suitable, and Occupied Habitat for Special Status Plant Species
NM-11-LN BLM Lease Notice LN for Special Cultural Resource
NM-14-LN BLM Lease Notice LN for Paleontological Resources

EOI #NM00020923

NM-2026-05-0665
NMNM106788115

NM, Farmington Field Office, BLM, PD
T. 24 N., R. 9 W., New Mexico Principal
Sec. 3 SE1/4.
San Juan County
160 Acres
Rental $480.00
12.50% Royalty Rate

Stipulations:

FFO-S15-CSU-46 BLM Stipulation CSU for Slopes Greater Than 15 Percent or 3 Feet Vertical Cuts
NM-13-CSU BLM Stipulation CSU for Paleontological Resources
FFO-BS-LN-41 BLM Lease Notice LN for Biological Survey
HQ-CR-1 BLM Lease Notice LN for Cultural Resource Protection
HQ-MLA-1 BLM Lease Notice LN for Notice to Lessee Concerning Mineral Leasing Act Section 2(a)(2)(A)
HQ-TES-1 BLM Lease Notice LN for Threatened and Endangered Species Act
NM-1-LN BLM Lease Notice LN for Potential, Suitable, and Occupied Habitat for Special Status Plant Species
NM-11-LN BLM Lease Notice LN for Special Cultural Resource
NM-14-LN BLM Lease Notice LN for Paleontological Resources

EOI #NM00020923

NM-2026-05-0666
NMNM106788116

NM, Farmington Field Office, BLM, PD
T. 25 N., R. 9 W., New Mexico Principal
Sec. 23 NE1/4, W1/2.
San Juan County
480 Acres
Rental $1,440.00
12.50% Royalty Rate
Stipulations:
FFO-S15-CSU-46 BLM Stipulation CSU for Slopes Greater Than 15 Percent or 3 Feet Vertical Cuts
NM-13-CSU BLM Stipulation CSU for Paleontological Resources
FFO-BS-LN-41 BLM Lease Notice LN for Biological Survey
HQ-CR-1 BLM Lease Notice LN for Cultural Resource Protection
HQ-MLA-1 BLM Lease Notice LN for Notice to Lessee Concerning Mineral Leasing Act Section 2(a)(2)(A)
HQ-TES-1 BLM Lease Notice LN for Threatened and Endangered Species Act
NM-1-LN BLM Lease Notice LN for Potential, Suitable, and Occupied Habitat for Special Status Plant Species
NM-11-LN BLM Lease Notice LN for Special Cultural Resource
NM-14-LN BLM Lease Notice LN for Paleontological Resources
FFO-CVTCP-NSO-39 BLM Stipulation NSO for Cultural Values and Traditional Cultural Properties
EOI #NM00020923

NM-2026-05-0667
NMNM106788117

NM, Farmington Field Office, BLM, PD
T. 25 N., R. 9 W., New Mexico Principal
Sec. 26 SE1/4.
San Juan County
160 Acres
Rental $480.00
12.50% Royalty Rate
Stipulations:
FFO-S15-CSU-46 BLM Stipulation CSU for Slopes Greater Than 15 Percent or 3 Feet Vertical Cuts
NM-13-CSU BLM Stipulation CSU for Paleontological Resources
FFO-BS-LN-41 BLM Lease Notice LN for Biological Survey
HQ-CR-1 BLM Lease Notice LN for Cultural Resource Protection
HQ-MLA-1 BLM Lease Notice LN for Notice to Lessee Concerning Mineral Leasing Act Section 2(a)(2)(A)
HQ-TES-1 BLM Lease Notice LN for Threatened and Endangered Species Act
NM-1-LN BLM Lease Notice LN for Potential, Suitable, and Occupied Habitat for Special Status Plant Species

NM-11-LN BLM Lease Notice LN for Special Cultural Resource
NM-14-LN BLM Lease Notice LN for Paleontological Resources
EOI #NM00020923

NM-2026-05-0668
NMNM106788118

NM, Farmington Field Office, BLM, PD
T. 25 N., R. 9 W., New Mexico Principal
Sec. 34 S1/2NW1/4, N1/2SW1/4.
San Juan County
160 Acres
Rental $480.00
12.50% Royalty Rate
Stipulations:
FFO-S15-CSU-46 BLM Stipulation CSU for Slopes Greater Than 15 Percent or 3 Feet Vertical Cuts
NM-13-CSU BLM Stipulation CSU for Paleontological Resources
FFO-BS-LN-41 BLM Lease Notice LN for Biological Survey
HQ-CR-1 BLM Lease Notice LN for Cultural Resource Protection
HQ-MLA-1 BLM Lease Notice LN for Notice to Lessee Concerning Mineral Leasing Act Section 2(a)(2)(A)
HQ-TES-1 BLM Lease Notice LN for Threatened and Endangered Species Act
NM-1-LN BLM Lease Notice LN for Potential, Suitable, and Occupied Habitat for Special Status Plant Species
NM-11-LN BLM Lease Notice LN for Special Cultural Resource
NM-14-LN BLM Lease Notice LN for Paleontological Resources
EOI #NM00020923

NM-2026-05-0669
NMNM106788119

NM, Farmington Field Office, BLM, PD
T. 25 N., R. 11 W., New Mexico Principal
Sec. 29 S1/2.
San Juan County
320 Acres
Rental $960.00
12.50% Royalty Rate
Stipulations:
NM-13-CSU BLM Stipulation CSU for Paleontological Resources
FFO-BS-LN-41 BLM Lease Notice LN for Biological Survey
HQ-CR-1 BLM Lease Notice LN for Cultural Resource Protection
HQ-MLA-1 BLM Lease Notice LN for Notice to Lessee Concerning Mineral Leasing Act Section 2(a)(2)(A)
HQ-TES-1 BLM Lease Notice LN for Threatened and Endangered Species Act
NM-1-LN BLM Lease Notice LN for Potential, Suitable, and Occupied Habitat for Special Status Plant Species

NM-11-LN BLM Lease Notice LN for Special Cultural Resource
NM-14-LN BLM Lease Notice LN for Paleontological Resources
EOI #NM00020923

NM-2026-05-0670
NMNM106788120

NM, Farmington Field Office, BLM, PD
T. 25 N., R. 11 W., New Mexico Principal
Sec. 30 LOTS 2;
Sec. 30 SE1/4NW1/4.
San Juan County
80.28 Acres
Rental $243.00
12.50% Royalty Rate
Stipulations:
NM-13-CSU BLM Stipulation CSU for Paleontological Resources
FFO-BS-LN-41 BLM Lease Notice LN for Biological Survey
HQ-CR-1 BLM Lease Notice LN for Cultural Resource Protection
HQ-MLA-1 BLM Lease Notice LN for Notice to Lessee Concerning Mineral Leasing Act Section 2(a)(2)(A)
HQ-TES-1 BLM Lease Notice LN for Threatened and Endangered Species Act
NM-1-LN BLM Lease Notice LN for Potential, Suitable, and Occupied Habitat for Special Status Plant Species
NM-11-LN BLM Lease Notice LN for Special Cultural Resource
NM-14-LN BLM Lease Notice LN for Paleontological Resources
EOI #NM00020923

NM-2026-05-0672
NMNM106788121

NM, Farmington Field Office, BLM, PD
T. 25 N., R. 11 W., New Mexico Principal
Sec. 34 LOTS 20, 21, 23.
San Juan County
85.95 Acres
Rental $258.00
12.50% Royalty Rate
Stipulations:
FFO-S15-CSU-46 BLM Stipulation CSU for Slopes Greater Than 15 Percent or 3 Feet Vertical Cuts
NM-13-CSU BLM Stipulation CSU for Paleontological Resources
FFO-BS-LN-41 BLM Lease Notice LN for Biological Survey
HQ-CR-1 BLM Lease Notice LN for Cultural Resource Protection
HQ-MLA-1 BLM Lease Notice LN for Notice to Lessee Concerning Mineral Leasing Act Section 2(a)(2)(A)
HQ-TES-1 BLM Lease Notice LN for Threatened and Endangered Species Act
NM-1-LN BLM Lease Notice LN for Potential, Suitable, and Occupied Habitat for Special

Status Plant Species
NM-11-LN BLM Lease Notice LN for Special Cultural Resource
NM-14-LN BLM Lease Notice LN for Paleontological Resources
EOI #NM00020923

NM-2026-05-0599 Split Estate
NMNM106788122

NM, Carlsbad Field Office, BLM, PD
T. 25 S., R. 24 E., New Mexico Principal
Sec. 12 N1/2, W1/2SW1/4, SE1/4SW1/4, E1/2SE1/4, SW1/4SE1/4.
Eddy County
560 Acres
Rental $1,680.00
12.50% Royalty Rate
Stipulations:
SENM-S-13-CSU BLM Stipulation CSU for Guadalupe Escarpment
SENM-S-17-CSU BLM Stipulation CSU for Slopes & Fragile Soils
SENM-S-18-CSU BLM Stipulation CSU for Streams, Rivers, and Floodplains
SENM-S-19-CSU BLM Stipulation CSU for Playas and Alkali Lakes
SENM-S-21-CSU BLM Stipulation CSU for Caves and Karst
SENM-S-32-CSU BLM Stipulation CSU for Guadalupe Escarpment Scenic Area VRM Class III
HQ-CR-1 BLM Lease Notice LN for Cultural Resource Protection
HQ-MLA-1 BLM Lease Notice LN for Notice to Lessee Concerning Mineral Leasing Act Section 2(a)(2)(A)
HQ-TES-1 BLM Lease Notice LN for Threatened and Endangered Species Act
NM-1-LN BLM Lease Notice LN for Potential, Suitable, and Occupied Habitat for Special Status Plant Species
NM-11-LN BLM Lease Notice LN for Special Cultural Resource
NM-14-LN BLM Lease Notice LN for Paleontological Resources
SENM-LN-1 BLM Lease Notice LN for Potential Cave or Karst Occurrence Area
PDO-SENM-GWBS-NSO-5 BLM Stipulation NSO for Gypsum Wild-buckwheat Species and Designated Critical Habitat
EOI #NM00020141

NM-2026-05-0586
NMNM106788123

NM, Carlsbad Field Office, BLM, PD
T. 20 S., R. 25 E., New Mexico Principal
Sec. 1 NE1/4SE1/4.
Eddy County
40 Acres
Rental $120.00
12.50% Royalty Rate
Stipulations:

SENM-S-17-CSU BLM Stipulation CSU for Slopes & Fragile Soils
SENM-S-21-CSU BLM Stipulation CSU for Caves and Karst
HQ-CR-1 BLM Lease Notice LN for Cultural Resource Protection
HQ-MLA-1 BLM Lease Notice LN for Notice to Lessee Concerning Mineral Leasing Act Section 2(a)(2)(A)
HQ-TES-1 BLM Lease Notice LN for Threatened and Endangered Species Act
NM-1-LN BLM Lease Notice LN for Potential, Suitable, and Occupied Habitat for Special Status Plant Species
NM-11-LN BLM Lease Notice LN for Special Cultural Resource
NM-14-LN BLM Lease Notice LN for Paleontological Resources
SENM-LN-1 BLM Lease Notice LN for Potential Cave or Karst Occurrence Area
EOI #NM00019301

NM-2026-05-0602
NMNM106788124

NM, Carlsbad Field Office, BLM, PD
T. 22 S., R. 25 E., New Mexico Principal
Sec. 3 LOTS 5 thru 12.
Eddy County
340.47 Acres
Rental $1,023.00
12.50% Royalty Rate
Stipulations:
SENM-S-17-CSU BLM Stipulation CSU for Slopes & Fragile Soils
SENM-S-18-CSU BLM Stipulation CSU for Streams, Rivers, and Floodplains
SENM-S-19-CSU BLM Stipulation CSU for Playas and Alkali Lakes
SENM-S-21-CSU BLM Stipulation CSU for Caves and Karst
HQ-CR-1 BLM Lease Notice LN for Cultural Resource Protection
HQ-MLA-1 BLM Lease Notice LN for Notice to Lessee Concerning Mineral Leasing Act Section 2(a)(2)(A)
HQ-TES-1 BLM Lease Notice LN for Threatened and Endangered Species Act
NM-1-LN BLM Lease Notice LN for Potential, Suitable, and Occupied Habitat for Special Status Plant Species
NM-11-LN BLM Lease Notice LN for Special Cultural Resource
NM-14-LN BLM Lease Notice LN for Paleontological Resources
SENM-LN-1 BLM Lease Notice LN for Potential Cave or Karst Occurrence Area
EOI #NM00020142

NM-2026-05-0645
NMNM106788125

NM, Carlsbad Field Office, BLM, PD
T. 23 S., R. 25 E., New Mexico Principal
Sec. 25 ALL.
Eddy County
640 Acres
Rental $1,920.00

12.50% Royalty Rate
Stipulations:
SENM-S-13-CSU BLM Stipulation CSU for Guadalupe Escarpment
SENM-S-17-CSU BLM Stipulation CSU for Slopes & Fragile Soils
SENM-S-18-CSU BLM Stipulation CSU for Streams, Rivers, and Floodplains
SENM-S-21-CSU BLM Stipulation CSU for Caves and Karst
SENM-S-25-CSU BLM Stipulation CSU for Visual Resource Management
SENM-S-32-CSU BLM Stipulation CSU for Guadalupe Escarpment Scenic Area VRM Class III
HQ-CR-1 BLM Lease Notice LN for Cultural Resource Protection
HQ-MLA-1 BLM Lease Notice LN for Notice to Lessee Concerning Mineral Leasing Act Section 2(a)(2)(A)
HQ-TES-1 BLM Lease Notice LN for Threatened and Endangered Species Act
NM-1-LN BLM Lease Notice LN for Potential, Suitable, and Occupied Habitat for Special Status Plant Species
NM-11-LN BLM Lease Notice LN for Special Cultural Resource
NM-14-LN BLM Lease Notice LN for Paleontological Resources
SENM-LN-1 BLM Lease Notice LN for Potential Cave or Karst Occurrence Area
EOI #NM00020453

NM-2026-05-0646
NMNM106788126

NM, Carlsbad Field Office, BLM, PD
T. 24 S., R. 25 E., New Mexico Principal
Sec. 1 S1/2NW1/4,SW1/4,S1/2SE1/4.
Eddy County
320 Acres
Rental $960.00
12.50% Royalty Rate
Stipulations:
SENM-S-17-CSU BLM Stipulation CSU for Slopes & Fragile Soils
SENM-S-18-CSU BLM Stipulation CSU for Streams, Rivers, and Floodplains
SENM-S-19-CSU BLM Stipulation CSU for Playas and Alkali Lakes
SENM-S-21-CSU BLM Stipulation CSU for Caves and Karst
SENM-S-25-CSU BLM Stipulation CSU for Visual Resource Management
HQ-CR-1 BLM Lease Notice LN for Cultural Resource Protection
HQ-MLA-1 BLM Lease Notice LN for Notice to Lessee Concerning Mineral Leasing Act Section 2(a)(2)(A)
HQ-TES-1 BLM Lease Notice LN for Threatened and Endangered Species Act
NM-1-LN BLM Lease Notice LN for Potential, Suitable, and Occupied Habitat for Special Status Plant Species
NM-11-LN BLM Lease Notice LN for Special Cultural Resource
NM-14-LN BLM Lease Notice LN for Paleontological Resources
SENM-LN-1 BLM Lease Notice LN for Potential Cave or Karst Occurrence Area
EOI #NM00020453

NM-2026-05-0600 Split Estate

NMNM106788127

NM, Carlsbad Field Office, BLM, PD

T. 24 S., R. 25 E., New Mexico Principal

Sec. 25 SW1/4.

Eddy County

160 Acres

Rental $480.00

12.50% Royalty Rate

Stipulations:

SENM-S-13-CSU BLM Stipulation CSU for Guadalupe Escarpment
SENM-S-17-CSU BLM Stipulation CSU for Slopes & Fragile Soils
SENM-S-18-CSU BLM Stipulation CSU for Streams, Rivers, and Floodplains
SENM-S-19-CSU BLM Stipulation CSU for Playas and Alkali Lakes
SENM-S-21-CSU BLM Stipulation CSU for Caves and Karst
SENM-S-32-CSU BLM Stipulation CSU for Guadalupe Escarpment Scenic Area VRM Class III
HQ-CR-1 BLM Lease Notice LN for Cultural Resource Protection
HQ-MLA-1 BLM Lease Notice LN for Notice to Lessee Concerning Mineral Leasing Act Section 2(a)(2)(A)
HQ-TES-1 BLM Lease Notice LN for Threatened and Endangered Species Act
NM-1-LN BLM Lease Notice LN for Potential, Suitable, and Occupied Habitat for Special Status Plant Species
NM-11-LN BLM Lease Notice LN for Special Cultural Resource
NM-14-LN BLM Lease Notice LN for Paleontological Resources
SENM-LN-1 BLM Lease Notice LN for Potential Cave or Karst Occurrence Area

EOI #NM00020140

NM-2026-05-0597 Split Estate
NMNM106788128

NM, Carlsbad Field Office, BLM, PD

T. 25 S., R. 25 E., New Mexico Principal

Sec. 6 LOTS 7;
Sec. 6 SE1/4SW1/4;
Sec. 7 LOTS 1,2,5 thru 17;
Sec. 8 LOTS 1 thru 8;
Sec. 8 E1/2;
Sec. 17 NW1/4NE1/4,NE1/4NW1/4;
Sec. 18 LOTS 1,2;
Sec. 18 NE1/4NE1/4,W1/2NE1/4,E1/2NW1/4.

Eddy County

1615.53 Acres

Rental $4,848.00

12.50% Royalty Rate

Stipulations:

SENM-S-13-CSU BLM Stipulation CSU for Guadalupe Escarpment
SENM-S-17-CSU BLM Stipulation CSU for Slopes & Fragile Soils
SENM-S-18-CSU BLM Stipulation CSU for Streams, Rivers, and Floodplains

SENM-S-20-CSU BLM Stipulation CSU for Springs, Seeps and Tanks
SENM-S-21-CSU BLM Stipulation CSU for Caves and Karst
SENM-S-32-CSU BLM Stipulation CSU for Guadalupe Escarpment Scenic Area VRM Class III
HQ-CR-1 BLM Lease Notice LN for Cultural Resource Protection
HQ-MLA-1 BLM Lease Notice LN for Notice to Lessee Concerning Mineral Leasing Act Section 2(a)(2)(A)
HQ-TES-1 BLM Lease Notice LN for Threatened and Endangered Species Act
NM-1-LN BLM Lease Notice LN for Potential, Suitable, and Occupied Habitat for Special Status Plant Species
NM-11-LN BLM Lease Notice LN for Special Cultural Resource
NM-14-LN BLM Lease Notice LN for Paleontological Resources
SENM-LN-1 BLM Lease Notice LN for Potential Cave or Karst Occurrence Area
PDO-SENM-GWBS-NSO-5 BLM Stipulation NSO for Gypsum Wild-buckwheat Species and Designated Critical Habitat

EOI #NM00020138, NM00020141, NM00020440

NM-2026-05-0598 Split Estate
NMNM106788129

NM, Carlsbad Field Office, BLM, PD
T. 25 S., R. 25 E., New Mexico Principal
Sec. 17 S1/2;
Sec. 18 SE1/4SE1/4;
Sec. 19 LOTS 1 thru 4;
Sec. 19 NE1/4,E1/2NW1/4,E1/2SW1/4,N1/2SE1/4;
Sec. 20 NW1/4,NW1/4SW1/4.
Eddy County
1115.12 Acres
Rental $3,348.00
12.50% Royalty Rate
Stipulations:
NM-13-CSU BLM Stipulation CSU for Paleontological Resources
SENM-S-13-CSU BLM Stipulation CSU for Guadalupe Escarpment
SENM-S-17-CSU BLM Stipulation CSU for Slopes & Fragile Soils
SENM-S-18-CSU BLM Stipulation CSU for Streams, Rivers, and Floodplains
SENM-S-19-CSU BLM Stipulation CSU for Playas and Alkali Lakes
SENM-S-21-CSU BLM Stipulation CSU for Caves and Karst
SENM-S-32-CSU BLM Stipulation CSU for Guadalupe Escarpment Scenic Area VRM Class III
HQ-CR-1 BLM Lease Notice LN for Cultural Resource Protection
HQ-MLA-1 BLM Lease Notice LN for Notice to Lessee Concerning Mineral Leasing Act Section 2(a)(2)(A)
HQ-TES-1 BLM Lease Notice LN for Threatened and Endangered Species Act
NM-1-LN BLM Lease Notice LN for Potential, Suitable, and Occupied Habitat for Special Status Plant Species
NM-11-LN BLM Lease Notice LN for Special Cultural Resource
NM-14-LN BLM Lease Notice LN for Paleontological Resources
SENM-LN-1 BLM Lease Notice LN for Potential Cave or Karst Occurrence Area

PDO-SENM-GWBS-NSO-5 BLM Stipulation NSO for Gypsum Wild-buckwheat Species and Designated Critical Habitat
EOI #NM00020138

NM-2026-05-6895
NMNM106788130

NM, Carlsbad Field Office, BLM, PD
T. 25 S., R. 25 E., New Mexico Principal
Sec. 27 SE1/4.
Eddy County
160 Acres
Rental $480.00
12.50% Royalty Rate
Stipulations:
SENM-S-13-CSU BLM Stipulation CSU for Guadalupe Escarpment
SENM-S-17-CSU BLM Stipulation CSU for Slopes & Fragile Soils
SENM-S-18-CSU BLM Stipulation CSU for Streams, Rivers, and Floodplains
SENM-S-21-CSU BLM Stipulation CSU for Caves and Karst
SENM-S-25-CSU BLM Stipulation CSU for Visual Resource Management
SENM-S-32-CSU BLM Stipulation CSU for Guadalupe Escarpment Scenic Area VRM Class III
HQ-CR-1 BLM Lease Notice LN for Cultural Resource Protection
HQ-MLA-1 BLM Lease Notice LN for Notice to Lessee Concerning Mineral Leasing Act Section 2(a)(2)(A)
HQ-TES-1 BLM Lease Notice LN for Threatened and Endangered Species Act
NM-1-LN BLM Lease Notice LN for Potential, Suitable, and Occupied Habitat for Special Status Plant Species
NM-11-LN BLM Lease Notice LN for Special Cultural Resource
NM-14-LN BLM Lease Notice LN for Paleontological Resources
SENM-LN-1 BLM Lease Notice LN for Potential Cave or Karst Occurrence Area
PDO-SENM-GWBS-NSO-5 BLM Stipulation NSO for Gypsum Wild-buckwheat Species and Designated Critical Habitat
EOI #NM00020139

NM-2026-05-6903
NMNM106788131

NM, Carlsbad Field Office, BLM, PD
T. 25 S., R. 25 E., New Mexico Principal
Sec. 31 LOTS 1 thru 4;
Sec. 31 E1/2,E1/2W1/2.
Eddy County
637.2 Acres
Rental $1,914.00
12.50% Royalty Rate
Stipulations:

SENM-S-13-CSU BLM Stipulation CSU for Guadalupe Escarpment
SENM-S-17-CSU BLM Stipulation CSU for Slopes & Fragile Soils
SENM-S-18-CSU BLM Stipulation CSU for Streams, Rivers, and Floodplains
SENM-S-19-CSU BLM Stipulation CSU for Playas and Alkali Lakes
SENM-S-21-CSU BLM Stipulation CSU for Caves and Karst
SENM-S-32-CSU BLM Stipulation CSU for Guadalupe Escarpment Scenic Area VRM Class III
HQ-CR-1 BLM Lease Notice LN for Cultural Resource Protection
HQ-MLA-1 BLM Lease Notice LN for Notice to Lessee Concerning Mineral Leasing Act Section 2(a)(2)(A)
HQ-TES-1 BLM Lease Notice LN for Threatened and Endangered Species Act
NM-1-LN BLM Lease Notice LN for Potential, Suitable, and Occupied Habitat for Special Status Plant Species
NM-11-LN BLM Lease Notice LN for Special Cultural Resource
NM-14-LN BLM Lease Notice LN for Paleontological Resources
SENM-LN-1 BLM Lease Notice LN for Potential Cave or Karst Occurrence Area
PDO-SENM-GWBS-NSO-5 BLM Stipulation NSO for Gypsum Wild-buckwheat Species and Designated Critical Habitat
EOI #NM00020139

NM-2026-05-6909
NMNM106788132
NM, Carlsbad Field Office, BLM, PD
T. 21 S., R. 26 E., New Mexico Principal
Sec. 24 LOTS 4 thru 6.
Eddy County
120.31 Acres
Rental $363.00
12.50% Royalty Rate
Stipulations:
SENM-S-17-CSU BLM Stipulation CSU for Slopes & Fragile Soils
SENM-S-18-CSU BLM Stipulation CSU for Streams, Rivers, and Floodplains
SENM-S-21-CSU BLM Stipulation CSU for Caves and Karst
HQ-CR-1 BLM Lease Notice LN for Cultural Resource Protection
HQ-MLA-1 BLM Lease Notice LN for Notice to Lessee Concerning Mineral Leasing Act Section 2(a)(2)(A)
HQ-TES-1 BLM Lease Notice LN for Threatened and Endangered Species Act
NM-1-LN BLM Lease Notice LN for Potential, Suitable, and Occupied Habitat for Special Status Plant Species
NM-11-LN BLM Lease Notice LN for Special Cultural Resource
NM-14-LN BLM Lease Notice LN for Paleontological Resources
SENM-LN-1 BLM Lease Notice LN for Potential Cave or Karst Occurrence Area
EOI #NM00020772

NOTATION:
The lands in Lots 4 and 5 of this parcel are being considered in a direct land sale to the City of Carlsbad. If and when a sale occurs, such lands would be annexed as City of Carlsbad city limits and closed to oil and gas leasing. If a land sale were to occur prior to the lease sale, these lands

would no longer be available for leasing, as the BLM cannot lease within city limits. It should also be noted that, separately from that sale, no surface disturbance will be allowed in Lot 6 due to an existing Recreation and Public Purposes Act Lease for a proposed school.

NM-2026-05-0614
NMNM106788133

NM, Carlsbad Field Office, BLM, PD
T. 21 S., R. 26 E., New Mexico Principal
Sec. 28 LOTS 9,10.
Eddy County
40.7 Acres
Rental $123.00
12.50% Royalty Rate
Stipulations:
SENM-S-17-CSU BLM Stipulation CSU for Slopes & Fragile Soils
SENM-S-18-CSU BLM Stipulation CSU for Streams, Rivers, and Floodplains
SENM-S-19-CSU BLM Stipulation CSU for Playas and Alkali Lakes
SENM-S-21-CSU BLM Stipulation CSU for Caves and Karst
SENM-S-25-CSU BLM Stipulation CSU for Visual Resource Management
HQ-CR-1 BLM Lease Notice LN for Cultural Resource Protection
HQ-MLA-1 BLM Lease Notice LN for Notice to Lessee Concerning Mineral Leasing Act Section 2(a)(2)(A)
HQ-TES-1 BLM Lease Notice LN for Threatened and Endangered Species Act
NM-11-LN BLM Lease Notice LN for Special Cultural Resource
NM-14-LN BLM Lease Notice LN for Paleontological Resources
SENM-LN-1 BLM Lease Notice LN for Potential Cave or Karst Occurrence Area
PDO-SENM-CMSR-NSO-40 BLM Stipulation NSO for Carlsbad Municipal Shooting Range and Recreational Areas
EOI #NM00019131, NM00020477

NM-2026-05-0591 Split Estate
NMNM106788134

NM, Carlsbad Field Office, BLM, PD
T. 24 S., R. 26 E., New Mexico Principal
Sec. 7 LOTS 4;
Sec. 7 SE1/4SW1/4.
Eddy County
79.17 Acres
Rental $240.00
12.50% Royalty Rate
Stipulations:
SENM-S-13-CSU BLM Stipulation CSU for Guadalupe Escarpment
SENM-S-17-CSU BLM Stipulation CSU for Slopes & Fragile Soils
SENM-S-18-CSU BLM Stipulation CSU for Streams, Rivers, and Floodplains
SENM-S-19-CSU BLM Stipulation CSU for Playas and Alkali Lakes
SENM-S-21-CSU BLM Stipulation CSU for Caves and Karst

SENM-S-25-CSU BLM Stipulation CSU for Visual Resource Management

SENM-S-32-CSU BLM Stipulation CSU for Guadalupe Escarpment Scenic Area VRM Class III
HQ-CR-1 BLM Lease Notice LN for Cultural Resource Protection
HQ-MLA-1 BLM Lease Notice LN for Notice to Lessee Concerning Mineral Leasing Act Section 2(a)(2)(A)
HQ-TES-1 BLM Lease Notice LN for Threatened and Endangered Species Act
NM-1-LN BLM Lease Notice LN for Potential, Suitable, and Occupied Habitat for Special Status Plant Species
NM-11-LN BLM Lease Notice LN for Special Cultural Resource
NM-14-LN BLM Lease Notice LN for Paleontological Resources
SENM-LN-1 BLM Lease Notice LN for Potential Cave or Karst Occurrence Area
EOI #NM00020083

NM-2026-05-0590
NMNM106788135
NM, Carlsbad Field Office, BLM, PD
T. 26 S., R. 26 E., New Mexico Principal
Sec. 7 LOTS 3, 4;
Sec. 7 E1/2SW1/4, SE1/4;
Sec. 18 LOTS 1.
Eddy County
360.34 Acres
Rental $1,083.00
12.50% Royalty Rate
Stipulations:
SENM-S-17-CSU BLM Stipulation CSU for Slopes & Fragile Soils
SENM-S-18-CSU BLM Stipulation CSU for Streams, Rivers, and Floodplains
SENM-S-20-CSU BLM Stipulation CSU for Springs, Seeps and Tanks
SENM-S-21-CSU BLM Stipulation CSU for Caves and Karst
HQ-CR-1 BLM Lease Notice LN for Cultural Resource Protection
HQ-MLA-1 BLM Lease Notice LN for Notice to Lessee Concerning Mineral Leasing Act Section 2(a)(2)(A)
HQ-TES-1 BLM Lease Notice LN for Threatened and Endangered Species Act
NM-1-LN BLM Lease Notice LN for Potential, Suitable, and Occupied Habitat for Special Status Plant Species
NM-11-LN BLM Lease Notice LN for Special Cultural Resource
NM-14-LN BLM Lease Notice LN for Paleontological Resources
SENM-LN-1 BLM Lease Notice LN for Potential Cave or Karst Occurrence Area
PDO-SENM-GWBS-NSO-5 BLM Stipulation NSO for Gypsum Wild-buckwheat Species and Designated Critical Habitat
EOI #NM00019872, NM00019873

NM-2026-05-0596
NMNM106788136

NM, Carlsbad Field Office, BLM, PD
T. 26 S., R. 26 E., New Mexico Principal
Sec. 30 E1/2;
Sec. 31 LOTS 1,2;
Sec. 31 N1/2NE1/4.
Eddy County
445.91 Acres
Rental $1,338.00
12.50% Royalty Rate
Stipulations:
SENM-S-17-CSU BLM Stipulation CSU for Slopes & Fragile Soils
SENM-S-21-CSU BLM Stipulation CSU for Caves and Karst
HQ-CR-1 BLM Lease Notice LN for Cultural Resource Protection
HQ-MLA-1 BLM Lease Notice LN for Notice to Lessee Concerning Mineral Leasing Act Section 2(a)(2)(A)
HQ-TES-1 BLM Lease Notice LN for Threatened and Endangered Species Act
NM-1-LN BLM Lease Notice LN for Potential, Suitable, and Occupied Habitat for Special Status Plant Species
NM-11-LN BLM Lease Notice LN for Special Cultural Resource
NM-14-LN BLM Lease Notice LN for Paleontological Resources
SENM-LN-1 BLM Lease Notice LN for Potential Cave or Karst Occurrence Area
EOI #NM00020137

NM-2026-05-6810 Split Estate
NMNM106788137

NM, Carlsbad Field Office, BLM, PD
T. 17 S., R. 27 E., New Mexico Principal
Sec. 6 NE1/4SW1/4, NW1/4SE1/4.
Eddy County
80 Acres
Rental $240.00
12.50% Royalty Rate
Stipulations:
NM-13-CSU BLM Stipulation CSU for Paleontological Resources
SENM-S-17-CSU BLM Stipulation CSU for Slopes & Fragile Soils
SENM-S-18-CSU BLM Stipulation CSU for Streams, Rivers, and Floodplains
SENM-S-19-CSU BLM Stipulation CSU for Playas and Alkali Lakes
SENM-S-21-CSU BLM Stipulation CSU for Caves and Karst

SENM-S-25-CSU BLM Stipulation CSU for Visual Resource Management
HQ-CR-1 BLM Lease Notice LN for Cultural Resource Protection
HQ-MLA-1 BLM Lease Notice LN for Notice to Lessee Concerning Mineral Leasing Act Section 2(a)(2)(A)
HQ-TES-1 BLM Lease Notice LN for Threatened and Endangered Species Act
NM-1-LN BLM Lease Notice LN for Potential, Suitable, and Occupied Habitat for Special Status Plant Species
NM-11-LN BLM Lease Notice LN for Special Cultural Resource
NM-14-LN BLM Lease Notice LN for Paleontological Resources
SENM-LN-1 BLM Lease Notice LN for Potential Cave or Karst Occurrence Area
SENM-S-9-NSO BLM Stipulation NSO for Pecos Bluntnose Shiner Habitat
EOI #NM00018645

NM-2026-05-6901
NMNM106788138

NM, Carlsbad Field Office, BLM, PD
T. 18 S., R. 27 E., New Mexico Principal
Sec. 34 W1/2;
Sec. 34 SE1/4.
Eddy County
480 Acres
Rental $1,440.00
12.50% Royalty Rate
Stipulations:
SENM-S-17-CSU BLM Stipulation CSU for Slopes & Fragile Soils
SENM-S-18-CSU BLM Stipulation CSU for Streams, Rivers, and Floodplains
SENM-S-19-CSU BLM Stipulation CSU for Playas and Alkali Lakes
SENM-S-21-CSU BLM Stipulation CSU for Caves and Karst
HQ-CR-1 BLM Lease Notice LN for Cultural Resource Protection
HQ-MLA-1 BLM Lease Notice LN for Notice to Lessee Concerning Mineral Leasing Act Section 2(a)(2)(A)
HQ-TES-1 BLM Lease Notice LN for Threatened and Endangered Species Act
NM-1-LN BLM Lease Notice LN for Potential, Suitable, and Occupied Habitat for Special Status Plant Species
NM-11-LN BLM Lease Notice LN for Special Cultural Resource
NM-14-LN BLM Lease Notice LN for Paleontological Resources
SENM-LN-1 BLM Lease Notice LN for Potential Cave or Karst Occurrence Area
EOI #NM00020386, NM00020387

NM-2026-05-0593
NMNM106788139

NM, Carlsbad Field Office, BLM, PD
T. 20 S., R. 27 E., New Mexico Principal
Sec. 9 SW1/4SE1/4.
Eddy County
40 Acres

Rental $120.00
12.50% Royalty Rate
Stipulations:
NM-13-CSU BLM Stipulation CSU for Paleontological Resources
SENM-S-17-CSU BLM Stipulation CSU for Slopes & Fragile Soils
SENM-S-18-CSU BLM Stipulation CSU for Streams, Rivers, and Floodplains
SENM-S-20-CSU BLM Stipulation CSU for Springs, Seeps and Tanks
SENM-S-21-CSU BLM Stipulation CSU for Caves and Karst
HQ-CR-1 BLM Lease Notice LN for Cultural Resource Protection
HQ-MLA-1 BLM Lease Notice LN for Notice to Lessee Concerning Mineral Leasing Act Section 2(a)(2)(A)
HQ-TES-1 BLM Lease Notice LN for Threatened and Endangered Species Act
NM-1-LN BLM Lease Notice LN for Potential, Suitable, and Occupied Habitat for Special Status Plant Species
NM-11-LN BLM Lease Notice LN for Special Cultural Resource
NM-14-LN BLM Lease Notice LN for Paleontological Resources
SENM-LN-1 BLM Lease Notice LN for Potential Cave or Karst Occurrence Area
PDO-SENM-GWBS-NSO-5 BLM Stipulation NSO for Gypsum Wild-buckwheat Species and Designated Critical Habitat
EOI #NM00020102

NM-2026-05-0640
NMNM106788140

NM, Carlsbad Field Office, BLM, PD
T. 16 S., R. 30 E., New Mexico Principal
Sec. 11 N1/2NE1/4, SE1/4NE1/4,N1/2NW1/4, SW1/4NW1/4.
Eddy County
240 Acres
Rental $720.00
12.50% Royalty Rate
Stipulations:
NM-13-CSU BLM Stipulation CSU for Paleontological Resources
SENM-S-17-CSU BLM Stipulation CSU for Slopes & Fragile Soils
SENM-S-22-CSU BLM Stipulation CSU for Lesser Prairie-Chickens
SENM-S-23-CSU BLM Stipulation CSU for Dunes Sagebrush Lizard
SENM-S-34-CSU BLM Stipulation CSU for Shinnery Oak Sand Dune Habitat Complex Plan Of Development
HQ-CR-1 BLM Lease Notice LN for Cultural Resource Protection
HQ-MLA-1 BLM Lease Notice LN for Notice to Lessee Concerning Mineral Leasing Act Section 2(a)(2)(A)
HQ-TES-1 BLM Lease Notice LN for Threatened and Endangered Species Act
NM-11-LN BLM Lease Notice LN for Special Cultural Resource
NM-14-LN BLM Lease Notice LN for Paleontological Resources
SENM-LN-2 BLM Lease Notice LN for Dunes Sagebrush Lizard
SENM-33-NSO BLM Stipulation NSO for Lesser Prairie-Chicken and Dunes Sagebrush Lizard Core Habitat

For the following lands:
T. 16 S., R. 30 E., New Mexico Principal, Sec. 11 SW1/4;
EOI #NM00020509

NM-2026-05-6904
NMNM106788141

NM, Carlsbad Field Office, BLM, PD
T. 16 S., R. 30 E., New Mexico Principal
Sec. 13 SW1/4.
Eddy County
160 Acres
Rental $480.00
12.50% Royalty Rate
Stipulations:
NM-13-CSU BLM Stipulation CSU for Paleontological Resources
SENM-S-18-CSU BLM Stipulation CSU for Streams, Rivers, and Floodplains
SENM-S-19-CSU BLM Stipulation CSU for Playas and Alkali Lakes
SENM-S-22-CSU BLM Stipulation CSU for Lesser Prairie-Chickens
SENM-S-23-CSU BLM Stipulation CSU for Dunes Sagebrush Lizard
SENM-S-34-CSU BLM Stipulation CSU for Shinnery Oak Sand Dune Habitat Complex Plan Of Development
HQ-CR-1 BLM Lease Notice LN for Cultural Resource Protection
HQ-MLA-1 BLM Lease Notice LN for Notice to Lessee Concerning Mineral Leasing Act Section 2(a)(2)(A)
HQ-TES-1 BLM Lease Notice LN for Threatened and Endangered Species Act
NM-11-LN BLM Lease Notice LN for Special Cultural Resource
NM-14-LN BLM Lease Notice LN for Paleontological Resources
SENM-LN-2 BLM Lease Notice LN for Dunes Sagebrush Lizard
SENM-33-NSO BLM Stipulation NSO for Lesser Prairie-Chicken and Dunes Sagebrush Lizard Core Habitat
SENM-44-NSO BLM Stipulation NSO for Paleontological Resources
For the following lands:
T. 16 S., R. 30 E., New Mexico Principal, Sec. 13 S1/2, SE1/4NW1/4, SW1/4NE1/4;
EOI #NM00020509

NM-2026-05-0594
NMNM106788142

NM, Carlsbad Field Office, BLM, PD
T. 16 S., R. 30 E., New Mexico Principal
Sec. 14 W1/2.
Eddy County
320 Acres
Rental $960.00
12.50% Royalty Rate
Stipulations:

NM-13-CSU BLM Stipulation CSU for Paleontological Resources
SENM-S-17-CSU BLM Stipulation CSU for Slopes & Fragile Soils
SENM-S-18-CSU BLM Stipulation CSU for Streams, Rivers, and Floodplains
SENM-S-19-CSU BLM Stipulation CSU for Playas and Alkali Lakes
SENM-S-22-CSU BLM Stipulation CSU for Lesser Prairie-Chickens
SENM-S-23-CSU BLM Stipulation CSU for Dunes Sagebrush Lizard
SENM-S-34-CSU BLM Stipulation CSU for Shinnery Oak Sand Dune Habitat Complex Plan Of Development
HQ-CR-1 BLM Lease Notice LN for Cultural Resource Protection
HQ-MLA-1 BLM Lease Notice LN for Notice to Lessee Concerning Mineral Leasing Act Section 2(a)(2)(A)
HQ-TES-1 BLM Lease Notice LN for Threatened and Endangered Species Act
NM-11-LN BLM Lease Notice LN for Special Cultural Resource
NM-14-LN BLM Lease Notice LN for Paleontological Resources
SENM-LN-2 BLM Lease Notice LN for Dunes Sagebrush Lizard
SENM-33-NSO BLM Stipulation NSO for Lesser Prairie-Chicken and Dunes Sagebrush Lizard Core Habitat
SENM-44-NSO BLM Stipulation NSO for Paleontological Resources
For the following lands:
T. 16 S., R. 30 E., New Mexico Principal, Sec. 14 S1/2, NW1/4;
EOI #NM00020126

NM-2026-05-6905
NMNM106788143

NM, Carlsbad Field Office, BLM, PD
T. 16 S., R. 30 E., New Mexico Principal
Sec. 23 SW1/4SE1/4.
Eddy County
40 Acres
Rental $120.00
12.50% Royalty Rate
Stipulations:
NM-13-CSU BLM Stipulation CSU for Paleontological Resources
SENM-S-17-CSU BLM Stipulation CSU for Slopes & Fragile Soils
SENM-S-22-CSU BLM Stipulation CSU for Lesser Prairie-Chickens
SENM-S-23-CSU BLM Stipulation CSU for Dunes Sagebrush Lizard
SENM-S-34-CSU BLM Stipulation CSU for Shinnery Oak Sand Dune Habitat Complex Plan Of Development
HQ-CR-1 BLM Lease Notice LN for Cultural Resource Protection
HQ-MLA-1 BLM Lease Notice LN for Notice to Lessee Concerning Mineral Leasing Act Section 2(a)(2)(A)
HQ-TES-1 BLM Lease Notice LN for Threatened and Endangered Species Act
NM-1-LN BLM Lease Notice LN for Potential, Suitable, and Occupied Habitat for Special Status Plant Species
NM-11-LN BLM Lease Notice LN for Special Cultural Resource
NM-14-LN BLM Lease Notice LN for Paleontological Resources
SENM-LN-2 BLM Lease Notice LN for Dunes Sagebrush Lizard

SENM-33-NSO BLM Stipulation NSO for Lesser Prairie-Chicken and Dunes Sagebrush Lizard Core Habitat
EOI #NM00020509

NM-2026-05-6906
NMNM106788144

NM, Carlsbad Field Office, BLM, PD
T. 16 S., R. 30 E., New Mexico Principal
Sec. 24 E1/2NE1/4,N1/2SW1/4,SE1/4.
Eddy County
320 Acres
Rental $960.00
12.50% Royalty Rate
Stipulations:
NM-13-CSU BLM Stipulation CSU for Paleontological Resources
SENM-S-17-CSU BLM Stipulation CSU for Slopes & Fragile Soils
SENM-S-22-CSU BLM Stipulation CSU for Lesser Prairie-Chickens
SENM-S-23-CSU BLM Stipulation CSU for Dunes Sagebrush Lizard
SENM-S-34-CSU BLM Stipulation CSU for Shinnery Oak Sand Dune Habitat Complex Plan Of Development
HQ-CR-1 BLM Lease Notice LN for Cultural Resource Protection
HQ-MLA-1 BLM Lease Notice LN for Notice to Lessee Concerning Mineral Leasing Act Section 2(a)(2)(A)
HQ-TES-1 BLM Lease Notice LN for Threatened and Endangered Species Act
NM-11-LN BLM Lease Notice LN for Special Cultural Resource
NM-14-LN BLM Lease Notice LN for Paleontological Resources
SENM-LN-2 BLM Lease Notice LN for Dunes Sagebrush Lizard
SENM-33-NSO BLM Stipulation NSO for Lesser Prairie-Chicken and Dunes Sagebrush Lizard Core Habitat
EOI #NM00020509

NM-2026-05-6907
NMNM106788145

NM, Carlsbad Field Office, BLM, PD
T. 16 S., R. 30 E., New Mexico Principal
Sec. 25 S1/2NW1/4.
Eddy County
80 Acres
Rental $240.00
12.50% Royalty Rate
Stipulations:
NM-13-CSU BLM Stipulation CSU for Paleontological Resources
SENM-S-17-CSU BLM Stipulation CSU for Slopes & Fragile Soils
SENM-S-18-CSU BLM Stipulation CSU for Streams, Rivers, and Floodplains
SENM-S-19-CSU BLM Stipulation CSU for Playas and Alkali Lakes
SENM-S-22-CSU BLM Stipulation CSU for Lesser Prairie-Chickens

SENM-S-23-CSU BLM Stipulation CSU for Dunes Sagebrush Lizard
SENM-S-34-CSU BLM Stipulation CSU for Shinnery Oak Sand Dune Habitat Complex Plan Of Development
HQ-CR-1 BLM Lease Notice LN for Cultural Resource Protection
HQ-MLA-1 BLM Lease Notice LN for Notice to Lessee Concerning Mineral Leasing Act Section 2(a)(2)(A)
HQ-TES-1 BLM Lease Notice LN for Threatened and Endangered Species Act
NM-11-LN BLM Lease Notice LN for Special Cultural Resource
NM-14-LN BLM Lease Notice LN for Paleontological Resources
SENM-LN-2 BLM Lease Notice LN for Dunes Sagebrush Lizard
SENM-33-NSO BLM Stipulation NSO for Lesser Prairie-Chicken and Dunes Sagebrush Lizard Core Habitat
SENM-44-NSO BLM Stipulation NSO for Paleontological Resources
EOI #NM00020509

NM-2026-05-0575
NMNM106788146
NM, Carlsbad Field Office, BLM, PD
T. 18 S., R. 30 E., New Mexico Principal
Sec. 15 W1/2SW1/4.
Eddy County
80 Acres
Rental $240.00
12.50% Royalty Rate
Stipulations:
NM-13-CSU BLM Stipulation CSU for Paleontological Resources
SENM-S-1-CSU BLM Stipulation CSU for Potash Area
SENM-S-17-CSU BLM Stipulation CSU for Slopes & Fragile Soils
SENM-S-20-CSU BLM Stipulation CSU for Springs, Seeps and Tanks
SENM-S-22-CSU BLM Stipulation CSU for Lesser Prairie-Chickens
SENM-S-23-CSU BLM Stipulation CSU for Dunes Sagebrush Lizard
SENM-S-34-CSU BLM Stipulation CSU for Shinnery Oak Sand Dune Habitat Complex Plan Of Development
HQ-CR-1 BLM Lease Notice LN for Cultural Resource Protection
HQ-MLA-1 BLM Lease Notice LN for Notice to Lessee Concerning Mineral Leasing Act Section 2(a)(2)(A)
HQ-TES-1 BLM Lease Notice LN for Threatened and Endangered Species Act
NM-1-LN BLM Lease Notice LN for Potential, Suitable, and Occupied Habitat for Special Status Plant Species
NM-11-LN BLM Lease Notice LN for Special Cultural Resource
NM-14-LN BLM Lease Notice LN for Paleontological Resources
SENM-LN-2 BLM Lease Notice LN for Dunes Sagebrush Lizard
SENM-LN-4 BLM Lease Notice LN for Hackberry Lake Off-Highway Vehicle Area
SENM-LN-6 BLM Lease Notice LN for Oil and Gas Development Within Designated Potash Area
SENM-33-NSO BLM Stipulation NSO for Lesser Prairie-Chicken and Dunes Sagebrush Lizard Core Habitat
EOI #NM00019896

NM-2026-05-0648
NMNM106788147

NM, Carlsbad Field Office, BLM, PD
T. 21 S., R. 30 E., New Mexico Principal
Sec. 13 NE1/4, E1/2NW1/4, SW1/4NW1/4.
Eddy County
280 Acres
Rental $840.00
12.50% Royalty Rate
Stipulations:
NM-13-CSU BLM Stipulation CSU for Paleontological Resources
SENM-S-1-CSU BLM Stipulation CSU for Potash Area
SENM-S-17-CSU BLM Stipulation CSU for Slopes & Fragile Soils
SENM-S-18-CSU BLM Stipulation CSU for Streams, Rivers, and Floodplains
SENM-S-19-CSU BLM Stipulation CSU for Playas and Alkali Lakes
SENM-S-21-CSU BLM Stipulation CSU for Caves and Karst
SENM-S-25-CSU BLM Stipulation CSU for Visual Resource Management
HQ-CR-1 BLM Lease Notice LN for Cultural Resource Protection
HQ-MLA-1 BLM Lease Notice LN for Notice to Lessee Concerning Mineral Leasing Act Section 2(a)(2)(A)
HQ-TES-1 BLM Lease Notice LN for Threatened and Endangered Species Act
NM-1-LN BLM Lease Notice LN for Potential, Suitable, and Occupied Habitat for Special Status Plant Species
NM-11-LN BLM Lease Notice LN for Special Cultural Resource
NM-14-LN BLM Lease Notice LN for Paleontological Resources
SENM-LN-1 BLM Lease Notice LN for Potential Cave or Karst Occurrence Area
SENM-LN-6 BLM Lease Notice LN for Oil and Gas Development Within Designated Potash Area
SENM-3-NSO BLM Stipulation NSO for Maroon Cliffs Archaeological District
EOI #NM00020697

NM-2026-05-0649
NMNM106788148

NM, Carlsbad Field Office, BLM, PD
T. 21 S., R. 30 E., New Mexico Principal
Sec. 24 NE1/4.
Eddy County
160 Acres
Rental $480.00
12.50% Royalty Rate
Stipulations:
SENM-S-1-CSU BLM Stipulation CSU for Potash Area
SENM-S-17-CSU BLM Stipulation CSU for Slopes & Fragile Soils
SENM-S-21-CSU BLM Stipulation CSU for Caves and Karst
SENM-S-22-CSU BLM Stipulation CSU for Lesser Prairie-Chickens

HQ-CR-1 BLM Lease Notice LN for Cultural Resource Protection
HQ-MLA-1 BLM Lease Notice LN for Notice to Lessee Concerning Mineral Leasing Act Section 2(a)(2)(A)
HQ-TES-1 BLM Lease Notice LN for Threatened and Endangered Species Act
NM-11-LN BLM Lease Notice LN for Special Cultural Resource
NM-14-LN BLM Lease Notice LN for Paleontological Resources
SENM-LN-1 BLM Lease Notice LN for Potential Cave or Karst Occurrence Area
SENM-LN-6 BLM Lease Notice LN for Oil and Gas Development Within Designated Potash Area
SENM-3-NSO BLM Stipulation NSO for Maroon Cliffs Archaeological District
SENM-33-NSO BLM Stipulation NSO for Lesser Prairie-Chicken and Dunes Sagebrush Lizard Core Habitat
EOI #NM00020701

NM-2026-05-0650 Split Estate
NMNM106788149

NM, Carlsbad Field Office, BLM, PD
T. 21 S., R. 31 E., New Mexico Principal
Sec. 3 S1/2;
Sec. 10 ALL.
Eddy County
960 Acres
Rental $2,880.00
12.50% Royalty Rate
Stipulations:
NM-13-CSU BLM Stipulation CSU for Paleontological Resources
SENM-S-1-CSU BLM Stipulation CSU for Potash Area
SENM-S-17-CSU BLM Stipulation CSU for Slopes & Fragile Soils
SENM-S-18-CSU BLM Stipulation CSU for Streams, Rivers, and Floodplains
SENM-S-19-CSU BLM Stipulation CSU for Playas and Alkali Lakes
SENM-S-21-CSU BLM Stipulation CSU for Caves and Karst
SENM-S-22-CSU BLM Stipulation CSU for Lesser Prairie-Chickens
SENM-S-23-CSU BLM Stipulation CSU for Dunes Sagebrush Lizard
SENM-S-34-CSU BLM Stipulation CSU for Shinnery Oak Sand Dune Habitat Complex Plan Of Development
HQ-CR-1 BLM Lease Notice LN for Cultural Resource Protection
HQ-MLA-1 BLM Lease Notice LN for Notice to Lessee Concerning Mineral Leasing Act Section 2(a)(2)(A)
HQ-TES-1 BLM Lease Notice LN for Threatened and Endangered Species Act
NM-1-LN BLM Lease Notice LN for Potential, Suitable, and Occupied Habitat for Special Status Plant Species
NM-11-LN BLM Lease Notice LN for Special Cultural Resource
NM-14-LN BLM Lease Notice LN for Paleontological Resources
SENM-LN-1 BLM Lease Notice LN for Potential Cave or Karst Occurrence Area
SENM-LN-2 BLM Lease Notice LN for Dunes Sagebrush Lizard
SENM-LN-6 BLM Lease Notice LN for Oil and Gas Development Within Designated Potash Area

SENM-33-NSO BLM Stipulation NSO for Lesser Prairie-Chicken and Dunes Sagebrush Lizard Core Habitat

EOI #NM00020706, NM00020708

NM-2026-05-0652

NMNM106788150

NM, Carlsbad Field Office, BLM, PD

T. 21 S., R. 31 E., New Mexico Principal

Sec. 17 SE1/4;
Sec. 20 NE1/4, S1/2;
Sec. 29 ALL;
Sec. 30 SE1/4SE1/4.

Eddy County

1320 Acres

Rental $3,960.00

12.50% Royalty Rate

Stipulations:

NM-13-CSU BLM Stipulation CSU for Paleontological Resources
SENM-S-1-CSU BLM Stipulation CSU for Potash Area
SENM-S-17-CSU BLM Stipulation CSU for Slopes & Fragile Soils
SENM-S-18-CSU BLM Stipulation CSU for Streams, Rivers, and Floodplains
SENM-S-19-CSU BLM Stipulation CSU for Playas and Alkali Lakes
SENM-S-21-CSU BLM Stipulation CSU for Caves and Karst
SENM-S-22-CSU BLM Stipulation CSU for Lesser Prairie-Chickens
SENM-S-25-CSU BLM Stipulation CSU for Visual Resource Management
HQ-CR-1 BLM Lease Notice LN for Cultural Resource Protection
HQ-MLA-1 BLM Lease Notice LN for Notice to Lessee Concerning Mineral Leasing Act Section 2(a)(2)(A)
HQ-TES-1 BLM Lease Notice LN for Threatened and Endangered Species Act
NM-1-LN BLM Lease Notice LN for Potential, Suitable, and Occupied Habitat for Special Status Plant Species
NM-11-LN BLM Lease Notice LN for Special Cultural Resource
NM-14-LN BLM Lease Notice LN for Paleontological Resources
SENM-LN-1 BLM Lease Notice LN for Potential Cave or Karst Occurrence Area
SENM-LN-6 BLM Lease Notice LN for Oil and Gas Development Within Designated Potash Area
SENM-3-NSO BLM Stipulation NSO for Maroon Cliffs Archaeological District
SENM-33-NSO BLM Stipulation NSO for Lesser Prairie-Chicken and Dunes Sagebrush Lizard Core Habitat

EOI #NM00020849, NM00020848, NM00020846, NM00020844

NM-2026-05-0743

NMNM106788151

NM, Carlsbad Field Office, BLM, PD

T. 21 S., R. 31 E., New Mexico Principal

Sec. 19 LOTS 1 thru 4;
Sec. 19 E1/2NW1/4, E1/2SW1/4, SE1/4;
Sec. 30 NE1/4.

Eddy County

636.24 Acres

Rental $1,911.00

12.50% Royalty Rate

Stipulations:

SENM-S-1-CSU BLM Stipulation CSU for Potash Area
SENM-S-17-CSU BLM Stipulation CSU for Slopes & Fragile Soils
SENM-S-18-CSU BLM Stipulation CSU for Streams, Rivers, and Floodplains
SENM-S-19-CSU BLM Stipulation CSU for Playas and Alkali Lakes
SENM-S-21-CSU BLM Stipulation CSU for Caves and Karst
SENM-S-22-CSU BLM Stipulation CSU for Lesser Prairie-Chickens
SENM-S-25-CSU BLM Stipulation CSU for Visual Resource Management
HQ-CR-1 BLM Lease Notice LN for Cultural Resource Protection
HQ-MLA-1 BLM Lease Notice LN for Notice to Lessee Concerning Mineral Leasing Act Section 2(a)(2)(A)
HQ-TES-1 BLM Lease Notice LN for Threatened and Endangered Species Act
NM-1-LN BLM Lease Notice LN for Potential, Suitable, and Occupied Habitat for Special Status Plant Species
NM-11-LN BLM Lease Notice LN for Special Cultural Resource
NM-14-LN BLM Lease Notice LN for Paleontological Resources
SENM-LN-1 BLM Lease Notice LN for Potential Cave or Karst Occurrence Area
SENM-LN-6 BLM Lease Notice LN for Oil and Gas Development Within Designated Potash Area
SENM-3-NSO BLM Stipulation NSO for Maroon Cliffs Archaeological District
SENM-33-NSO BLM Stipulation NSO for Lesser Prairie-Chicken and Dunes Sagebrush Lizard Core Habitat

EOI #NM00020847, NM00020849

NM-2026-05-0653
NMNM106788152

NM, Carlsbad Field Office, BLM, PD

T. 22 S., R. 31 E., New Mexico Principal

Sec. 5 LOTS 1 thru 4;
Sec. 5 S1/2NE1/4, S1/2NW1/4, N1/2SW1/4, N1/2SE1/4, N1/2S1/2S1/2.

Eddy County

559.72 Acres

Rental $1,680.00

12.50% Royalty Rate

Stipulations:

NM-13-CSU BLM Stipulation CSU for Paleontological Resources
SENM-S-1-CSU BLM Stipulation CSU for Potash Area
SENM-S-19-CSU BLM Stipulation CSU for Playas and Alkali Lakes
SENM-S-22-CSU BLM Stipulation CSU for Lesser Prairie-Chickens
HQ-CR-1 BLM Lease Notice LN for Cultural Resource Protection

HQ-MLA-1 BLM Lease Notice LN for Notice to Lessee Concerning Mineral Leasing Act Section 2(a)(2)(A)
HQ-TES-1 BLM Lease Notice LN for Threatened and Endangered Species Act
NM-1-LN BLM Lease Notice LN for Potential, Suitable, and Occupied Habitat for Special Status Plant Species
NM-11-LN BLM Lease Notice LN for Special Cultural Resource
NM-14-LN BLM Lease Notice LN for Paleontological Resources
SENM-LN-6 BLM Lease Notice LN for Oil and Gas Development Within Designated Potash Area
SENM-33-NSO BLM Stipulation NSO for Lesser Prairie-Chicken and Dunes Sagebrush Lizard Core Habitat

EOI #NM00020924

NM-2026-05-0654
NMNM106788153

NM, Carlsbad Field Office, BLM, PD
T. 22 S., R. 31 E., New Mexico Principal
Sec. 6 LOTS 3 thru 5;
Sec. 6 SE1/4NW1/4.
Eddy County
159.47 Acres
Rental $480.00
12.50% Royalty Rate
Stipulations:
SENM-S-1-CSU BLM Stipulation CSU for Potash Area
SENM-S-19-CSU BLM Stipulation CSU for Playas and Alkali Lakes
SENM-S-21-CSU BLM Stipulation CSU for Caves and Karst
SENM-S-22-CSU BLM Stipulation CSU for Lesser Prairie-Chickens
HQ-CR-1 BLM Lease Notice LN for Cultural Resource Protection
HQ-MLA-1 BLM Lease Notice LN for Notice to Lessee Concerning Mineral Leasing Act Section 2(a)(2)(A)
HQ-TES-1 BLM Lease Notice LN for Threatened and Endangered Species Act
NM-11-LN BLM Lease Notice LN for Special Cultural Resource
NM-14-LN BLM Lease Notice LN for Paleontological Resources
SENM-LN-1 BLM Lease Notice LN for Potential Cave or Karst Occurrence Area
SENM-LN-6 BLM Lease Notice LN for Oil and Gas Development Within Designated Potash Area
SENM-33-NSO BLM Stipulation NSO for Lesser Prairie-Chicken and Dunes Sagebrush Lizard Core Habitat

EOI #NM00020920

NM-2026-05-0651
NMNM106788154

NM, Carlsbad Field Office, BLM, PD
T. 22 S., R. 31 E., New Mexico Principal
Sec. 8 ALL.
Eddy County

640 Acres
Rental $1,920.00
12.50% Royalty Rate
Stipulations:

NM-13-CSU BLM Stipulation CSU for Paleontological Resources
SENM-S-1-CSU BLM Stipulation CSU for Potash Area
SENM-S-17-CSU BLM Stipulation CSU for Slopes & Fragile Soils
SENM-S-22-CSU BLM Stipulation CSU for Lesser Prairie-Chickens
HQ-CR-1 BLM Lease Notice LN for Cultural Resource Protection
HQ-MLA-1 BLM Lease Notice LN for Notice to Lessee Concerning Mineral Leasing Act Section 2(a)(2)(A)
HQ-TES-1 BLM Lease Notice LN for Threatened and Endangered Species Act
NM-1-LN BLM Lease Notice LN for Potential, Suitable, and Occupied Habitat for Special Status Plant Species
NM-11-LN BLM Lease Notice LN for Special Cultural Resource
NM-14-LN BLM Lease Notice LN for Paleontological Resources
SENM-LN-6 BLM Lease Notice LN for Oil and Gas Development Within Designated Potash Area
SENM-33-NSO BLM Stipulation NSO for Lesser Prairie-Chicken and Dunes Sagebrush Lizard Core Habitat

EOI #NM00020850

NOTATION:
This parcel borders the Waste Isolation Pilot Plant (WIPP) managed by the Department of Energy, and is also subject to stipulation SENM-S-33-NSO for LEPC and/or DSL habitat, which would prohibit surface disturbance within the parcel itself and require off-lease development. If at some point in the future, the NSO for LEPC and DSL is no longer necessary on this parcel, COAs may be required at the development stage to mitigate potential impacts to the WIPP

NM-2026-05-6908
NMNM106788155

NM, Carlsbad Field Office, DOE, PD
T. 22 S., R. 31 E., New Mexico Principal
Sec. 9 ALL;
Sec. 10 SW1/4NE1/4,NW1/4NW1/4,S1/2NW1/4,S1/2.
Eddy County
1120 Acres
Rental $3,360.00
12.50% Royalty Rate
Agreements:

NMNM106753006 This parcel is fully committed to the Party Bees Unit Agreement (UA) NMNM106753006, currently designated/pre-approved. The UA operator is OXY USA, Inc.. In accordance with the regulations in 43 CFR 3101.3-1, the successful bidder is required to file evidence of having entered into an agreement with the UA operator for the development and operations of the subject lands under the terms and provisions of the approved UA. The successful bidder should immediately contact the Operator in order to join the UA, the Operator will give instructions about executing copies of the joinder agreement. Five duplicate

originally signed copies of the joinder agreement must be furnished to the Bureau of Land Management Reservoir Management Group within 60 business days of the sale date. If more time is required, you must request an extension of time in which to comply. If not submitted within the time allowed, your bid may be subject to rejection.

Stipulations:

SENM-S-1-CSU BLM Stipulation CSU for Potash Area
SENM-S-18-CSU BLM Stipulation CSU for Streams, Rivers, and Floodplains
SENM-S-19-CSU BLM Stipulation CSU for Playas and Alkali Lakes
SENM-S-22-CSU BLM Stipulation CSU for Lesser Prairie-Chickens
HQ-CR-1 BLM Lease Notice LN for Cultural Resource Protection
HQ-MLA-1 BLM Lease Notice LN for Notice to Lessee Concerning Mineral Leasing Act Section 2(a)(2)(A)
HQ-TES-1 BLM Lease Notice LN for Threatened and Endangered Species Act
NM-11-LN BLM Lease Notice LN for Special Cultural Resource
NM-14-LN BLM Lease Notice LN for Paleontological Resources
SENM-LN-6 BLM Lease Notice LN for Oil and Gas Development Within Designated Potash Area
SENM-33-NSO BLM Stipulation NSO for Lesser Prairie-Chicken and Dunes Sagebrush Lizard Core Habitat

EOI #NM00020851, NM00020852

Lease Notation:
This parcel is fully committed to the Party Bees UA NMNM106753006, currently designated/pre-approved. OXY USA, Inc., is the UA operator. In accordance with the regulations in 43 C.F.R. § 3101.3-1, the successful bidder is required to file evidence of having entered into an agreement with the UA operator for the development and operations of the subject lands under the terms and provisions of the approved UA. The successful bidder should immediately contact the Operator in order to join the UA, and the Operator will give instructions about executing copies of the joinder agreement. Five duplicate, originally signed copies of the joinder agreement must be furnished to the BLM Reservoir Management Group within 60 business days of the sale date. If more time is required, you must request an extension of time in which to comply. If not submitted within the time allowed, your bid may be subject to rejection. This parcel borders the Waste Isolation Pilot Plant (WIPP) managed by the Department of Energy and is also subject to stipulation SENM-S-33-NSO for LEPC and/or DSL habitat, which would prohibit surface disturbance within the parcel itself and require off-lease development. If at some point in the future, the NSO for LEPC and DSL is no longer necessary on this parcel, COAs may be required at the development stage to mitigate potential impacts to the WIPP.

NM-2026-05-0655
NMNM106788156

NM, Carlsbad Field Office, BLM, PD
T. 22 S., R. 31 E., New Mexico Principal
Sec. 11 SW1/4SW1/4;
Sec. 14 SW1/4NE1/4, W1/2, NW1/4SE1/4, S1/2SE1/4.
Eddy County
520 Acres
Rental $1,560.00

12.50% Royalty Rate
Agreements:

NMNM106753006 This parcel is fully committed to the Party Bees Unit Agreement (UA) NMNM106753006, currently designated/pre-approved. The UA operator is OXY USA, Inc.. In accordance with the regulations in 43 CFR 3101.3-1, the successful bidder is required to file evidence of having entered into an agreement with the UA operator for the development and operations of the subject lands under the terms and provisions of the approved UA. The successful bidder should immediately contact the Operator in order to join the UA, the Operator will give instructions about executing copies of the joinder agreement. Five duplicate originally signed copies of the joinder agreement must be furnished to the Bureau of Land Management Reservoir Management Group within 60 business days of the sale date. If more time is required, you must request an extension of time in which to comply. If not submitted within the time allowed, your bid may be subject to rejection.

Stipulations:

NM-13-CSU BLM Stipulation CSU for Paleontological Resources
SENM-S-1-CSU BLM Stipulation CSU for Potash Area
SENM-S-17-CSU BLM Stipulation CSU for Slopes & Fragile Soils
SENM-S-22-CSU BLM Stipulation CSU for Lesser Prairie-Chickens
HQ-CR-1 BLM Lease Notice LN for Cultural Resource Protection
HQ-MLA-1 BLM Lease Notice LN for Notice to Lessee Concerning Mineral Leasing Act Section 2(a)(2)(A)
HQ-TES-1 BLM Lease Notice LN for Threatened and Endangered Species Act
NM-11-LN BLM Lease Notice LN for Special Cultural Resource
NM-14-LN BLM Lease Notice LN for Paleontological Resources
SENM-LN-6 BLM Lease Notice LN for Oil and Gas Development Within Designated Potash Area
SENM-33-NSO BLM Stipulation NSO for Lesser Prairie-Chicken and Dunes Sagebrush Lizard Core Habitat

EOI #NM00020853, NM00020854

LEASE NOTATION:
This parcel is fully committed to the Party Bees Unit Agreement (UA) NMNM106753006, currently designated/pre-approved. OXY USA, Inc., is the UA operator. In accordance with the regulations in 43 C.F.R. § 3101.3-1, the successful bidder is required to file evidence of having entered into an agreement with the UA operator for the development and operations of the subject lands under the terms and provisions of the approved UA. The successful bidder should immediately contact the Operator in order to join the UA, and the Operator will give instructions about executing copies of the joinder agreement. Five duplicate, originally signed copies of the joinder agreement must be furnished to the BLM Reservoir Management Group within 60 business days of the sale date. If more time is required, you must request an extension of time in which to comply. If not submitted within the time allowed, your bid may be subject to rejection. This parcel borders the Waste Isolation Pilot Plant (WIPP) managed by the Department of Energy and is also subject to stipulation SENM-S-33-NSO for LEPC and/or DSL habitat, which would prohibit surface disturbance within the parcel itself and require off-lease development. If at some point in the future, the NSO for LEPC and DSL is no longer necessary on this parcel, COAs may be required at the development stage to mitigate potential impacts to the WIPP.

NM-2026-05-0623
NMNM106788157

NM, Carlsbad Field Office, BLM, PD
T. 18 S., R. 32 E., New Mexico Principal
Sec. 19 N1/2SE1/4.
Lea County
80 Acres
Rental $240.00
12.50% Royalty Rate
Stipulations:
SENM-S-17-CSU BLM Stipulation CSU for Slopes & Fragile Soils
SENM-S-19-CSU BLM Stipulation CSU for Playas and Alkali Lakes
SENM-S-22-CSU BLM Stipulation CSU for Lesser Prairie-Chickens
SENM-S-23-CSU BLM Stipulation CSU for Dunes Sagebrush Lizard
SENM-S-34-CSU BLM Stipulation CSU for Shinnery Oak Sand Dune Habitat Complex Plan Of Development
HQ-CR-1 BLM Lease Notice LN for Cultural Resource Protection
HQ-MLA-1 BLM Lease Notice LN for Notice to Lessee Concerning Mineral Leasing Act Section 2(a)(2)(A)
HQ-TES-1 BLM Lease Notice LN for Threatened and Endangered Species Act
NM-11-LN BLM Lease Notice LN for Special Cultural Resource
NM-14-LN BLM Lease Notice LN for Paleontological Resources
SENM-LN-2 BLM Lease Notice LN for Dunes Sagebrush Lizard
SENM-33-NSO BLM Stipulation NSO for Lesser Prairie-Chicken and Dunes Sagebrush Lizard Core Habitat
EOI #NM00020271

NM-2026-05-0490
NMNM106788158

NM, Carlsbad Field Office, BLM, PD
T. 20 S., R. 32 E., New Mexico Principal
Sec. 9 NW1/4.
Lea County
160 Acres
Rental $480.00
12.50% Royalty Rate
Stipulations:
NM-13-CSU BLM Stipulation CSU for Paleontological Resources
SENM-S-1-CSU BLM Stipulation CSU for Potash Area
SENM-S-17-CSU BLM Stipulation CSU for Slopes & Fragile Soils
SENM-S-19-CSU BLM Stipulation CSU for Playas and Alkali Lakes
SENM-S-21-CSU BLM Stipulation CSU for Caves and Karst
SENM-S-22-CSU BLM Stipulation CSU for Lesser Prairie-Chickens
SENM-S-23-CSU BLM Stipulation CSU for Dunes Sagebrush Lizard
SENM-S-34-CSU BLM Stipulation CSU for Shinnery Oak Sand Dune Habitat Complex Plan Of Development
HQ-CR-1 BLM Lease Notice LN for Cultural Resource Protection

HQ-MLA-1 BLM Lease Notice LN for Notice to Lessee Concerning Mineral Leasing Act Section 2(a)(2)(A)
HQ-TES-1 BLM Lease Notice LN for Threatened and Endangered Species Act
NM-1-LN BLM Lease Notice LN for Potential, Suitable, and Occupied Habitat for Special Status Plant Species
NM-11-LN BLM Lease Notice LN for Special Cultural Resource
NM-14-LN BLM Lease Notice LN for Paleontological Resources
SENM-LN-1 BLM Lease Notice LN for Potential Cave or Karst Occurrence Area
SENM-LN-2 BLM Lease Notice LN for Dunes Sagebrush Lizard
SENM-LN-6 BLM Lease Notice LN for Oil and Gas Development Within Designated Potash Area
SENM-4-NSO BLM Stipulation NSO for Laguna Plata Archaeological District
SENM-33-NSO BLM Stipulation NSO for Lesser Prairie-Chicken and Dunes Sagebrush Lizard Core Habitat
EOI #NM00019369

NM-2026-05-0583
NMNM106788159

NM, Carlsbad Field Office, BLM, PD
T. 21 S., R. 32 E., New Mexico Principal
Sec. 26 NE1/4SW1/4,N1/2SE1/4.
Lea County
120 Acres
Rental $360.00
12.50% Royalty Rate
Stipulations:
NM-13-CSU BLM Stipulation CSU for Paleontological Resources
SENM-S-1-CSU BLM Stipulation CSU for Potash Area
SENM-S-17-CSU BLM Stipulation CSU for Slopes & Fragile Soils
SENM-S-18-CSU BLM Stipulation CSU for Streams, Rivers, and Floodplains
SENM-S-22-CSU BLM Stipulation CSU for Lesser Prairie-Chickens
HQ-CR-1 BLM Lease Notice LN for Cultural Resource Protection
HQ-MLA-1 BLM Lease Notice LN for Notice to Lessee Concerning Mineral Leasing Act Section 2(a)(2)(A)
HQ-TES-1 BLM Lease Notice LN for Threatened and Endangered Species Act
NM-11-LN BLM Lease Notice LN for Special Cultural Resource
NM-14-LN BLM Lease Notice LN for Paleontological Resources
SENM-LN-6 BLM Lease Notice LN for Oil and Gas Development Within Designated Potash Area
SENM-33-NSO BLM Stipulation NSO for Lesser Prairie-Chicken and Dunes Sagebrush Lizard Core Habitat
EOI #NM00019900

NM-2026-05-0639 Split Estate
NMNM106788160

NM, Roswell Field Office, BLM, PD

T. 9 N., R. 33 E., New Mexico Principal
Sec. 18 LOTS 4;
Sec. 18 NW1/4SE1/4,SE1/4SE1/4.
Quay County
120.09 Acres
Rental $363.00
12.50% Royalty Rate
Stipulations:
SENM-S-18-CSU BLM Stipulation CSU for Streams, Rivers, and Floodplains
SENM-S-25-CSU BLM Stipulation CSU for Visual Resource Management
HQ-CR-1 BLM Lease Notice LN for Cultural Resource Protection
HQ-MLA-1 BLM Lease Notice LN for Notice to Lessee Concerning Mineral Leasing Act Section 2(a)(2)(A)
HQ-TES-1 BLM Lease Notice LN for Threatened and Endangered Species Act
NM-11-LN BLM Lease Notice LN for Special Cultural Resource
NM-14-LN BLM Lease Notice LN for Paleontological Resources
EOI #NM00020388

NM-2026-05-0641 Split Estate
NMNM106788161
NM, Roswell Field Office, BLM, PD
T. 9 N., R. 33 E., New Mexico Principal
Sec. 19 LOTS 3;
Sec. 19 SW1/4NE1/4.
Quay County
79.9 Acres
Rental $240.00
12.50% Royalty Rate
Stipulations:
SENM-S-18-CSU BLM Stipulation CSU for Streams, Rivers, and Floodplains
SENM-S-20-CSU BLM Stipulation CSU for Springs, Seeps and Tanks
SENM-S-25-CSU BLM Stipulation CSU for Visual Resource Management
HQ-CR-1 BLM Lease Notice LN for Cultural Resource Protection
HQ-MLA-1 BLM Lease Notice LN for Notice to Lessee Concerning Mineral Leasing Act Section 2(a)(2)(A)
HQ-TES-1 BLM Lease Notice LN for Threatened and Endangered Species Act
NM-11-LN BLM Lease Notice LN for Special Cultural Resource
NM-14-LN BLM Lease Notice LN for Paleontological Resources
EOI #NM00020388

NM-2026-05-0643 Split Estate
NMNM106788162
NM, Roswell Field Office, BLM, PD
T. 9 N., R. 33 E., New Mexico Principal
Sec. 20 SW1/4NW1/4,E1/2SW1/4,SW1/4SE1/4.
Quay County

160 Acres
Rental $480.00
12.50% Royalty Rate
Stipulations:
SENM-S-18-CSU BLM Stipulation CSU for Streams, Rivers, and Floodplains
SENM-S-20-CSU BLM Stipulation CSU for Springs, Seeps and Tanks
SENM-S-25-CSU BLM Stipulation CSU for Visual Resource Management
HQ-CR-1 BLM Lease Notice LN for Cultural Resource Protection
HQ-MLA-1 BLM Lease Notice LN for Notice to Lessee Concerning Mineral Leasing Act Section 2(a)(2)(A)
HQ-TES-1 BLM Lease Notice LN for Threatened and Endangered Species Act
NM-11-LN BLM Lease Notice LN for Special Cultural Resource
NM-14-LN BLM Lease Notice LN for Paleontological Resources
EOI #NM00020388

NM-2026-05-0616 Split Estate
NMNM106788163
NM, Carlsbad Field Office, BLM, PD
T. 22 S., R. 33 E., New Mexico Principal
Sec. 13 N1/2,SW1/4.
Lea County
480 Acres
Rental $1,440.00
12.50% Royalty Rate
Stipulations:
SENM-S-17-CSU BLM Stipulation CSU for Slopes & Fragile Soils
SENM-S-18-CSU BLM Stipulation CSU for Streams, Rivers, and Floodplains
SENM-S-19-CSU BLM Stipulation CSU for Playas and Alkali Lakes
SENM-S-20-CSU BLM Stipulation CSU for Springs, Seeps and Tanks
SENM-S-22-CSU BLM Stipulation CSU for Lesser Prairie-Chickens
HQ-CR-1 BLM Lease Notice LN for Cultural Resource Protection
HQ-MLA-1 BLM Lease Notice LN for Notice to Lessee Concerning Mineral Leasing Act Section 2(a)(2)(A)
HQ-TES-1 BLM Lease Notice LN for Threatened and Endangered Species Act
NM-11-LN BLM Lease Notice LN for Special Cultural Resource
NM-14-LN BLM Lease Notice LN for Paleontological Resources
SENM-33-NSO BLM Stipulation NSO for Lesser Prairie-Chicken and Dunes Sagebrush Lizard Core Habitat
EOI #NM00020308

NM-2026-05-0551
NMNM106788164
NM, Carlsbad Field Office, BLM, PD
T. 22 S., R. 33 E., New Mexico Principal
Sec. 14 S1/2NW1/4, S1/2NE1/4, S1/2;
Sec. 23 NW1/4, S1/2;
Sec. 26 NW1/4NE1/4.

Lea County
1000 Acres
Rental $3,000.00
12.50% Royalty Rate
Stipulations:
NM-13-CSU BLM Stipulation CSU for Paleontological Resources
SENM-S-17-CSU BLM Stipulation CSU for Slopes & Fragile Soils
SENM-S-18-CSU BLM Stipulation CSU for Streams, Rivers, and Floodplains
SENM-S-22-CSU BLM Stipulation CSU for Lesser Prairie-Chickens
HQ-CR-1 BLM Lease Notice LN for Cultural Resource Protection
HQ-MLA-1 BLM Lease Notice LN for Notice to Lessee Concerning Mineral Leasing Act Section 2(a)(2)(A)
HQ-TES-1 BLM Lease Notice LN for Threatened and Endangered Species Act
NM-11-LN BLM Lease Notice LN for Special Cultural Resource
NM-14-LN BLM Lease Notice LN for Paleontological Resources
SENM-33-NSO BLM Stipulation NSO for Lesser Prairie-Chicken and Dunes Sagebrush Lizard Core Habitat
EOI #NM00019842

NM-2026-05-6890 Split Estate
NMNM106788165
NM, Carlsbad Field Office, BLM, PD
T. 22 S., R. 33 E., New Mexico Principal
Sec. 20 SW1/4SE1/4.
Lea County
40 Acres
Rental $120.00
12.50% Royalty Rate
Stipulations:
NM-13-CSU BLM Stipulation CSU for Paleontological Resources
SENM-S-17-CSU BLM Stipulation CSU for Slopes & Fragile Soils
SENM-S-22-CSU BLM Stipulation CSU for Lesser Prairie-Chickens
HQ-CR-1 BLM Lease Notice LN for Cultural Resource Protection
HQ-MLA-1 BLM Lease Notice LN for Notice to Lessee Concerning Mineral Leasing Act Section 2(a)(2)(A)
HQ-TES-1 BLM Lease Notice LN for Threatened and Endangered Species Act
NM-11-LN BLM Lease Notice LN for Special Cultural Resource
NM-14-LN BLM Lease Notice LN for Paleontological Resources
SENM-33-NSO BLM Stipulation NSO for Lesser Prairie-Chicken and Dunes Sagebrush Lizard Core Habitat
EOI #NM00019848

NM-2026-05-0566 Split Estate
NMNM106788166

NM, Carlsbad Field Office, BLM, PD
T. 22 S., R. 33 E., New Mexico Principal
Sec. 20 E1/2NE1/4;
Sec. 21 NE1/4,N1/2NW1/4.
Lea County
320 Acres
Rental $960.00
12.50% Royalty Rate
Stipulations:
SENM-S-17-CSU BLM Stipulation CSU for Slopes & Fragile Soils
SENM-S-22-CSU BLM Stipulation CSU for Lesser Prairie-Chickens
HQ-CR-1 BLM Lease Notice LN for Cultural Resource Protection
HQ-MLA-1 BLM Lease Notice LN for Notice to Lessee Concerning Mineral Leasing Act Section 2(a)(2)(A)
HQ-TES-1 BLM Lease Notice LN for Threatened and Endangered Species Act
NM-11-LN BLM Lease Notice LN for Special Cultural Resource
NM-14-LN BLM Lease Notice LN for Paleontological Resources
SENM-33-NSO BLM Stipulation NSO for Lesser Prairie-Chicken and Dunes Sagebrush Lizard Core Habitat
EOI #NM00019848, NM00019897

NM-2026-05-0568 Split Estate
NMNM106788167

NM, Carlsbad Field Office, BLM, PD
T. 22 S., R. 33 E., New Mexico Principal
Sec. 24 ALL;
Sec. 25 NE1/4.
Lea County
800 Acres
Rental $2,400.00
12.50% Royalty Rate
Stipulations:
NM-13-CSU BLM Stipulation CSU for Paleontological Resources
SENM-S-17-CSU BLM Stipulation CSU for Slopes & Fragile Soils
SENM-S-22-CSU BLM Stipulation CSU for Lesser Prairie-Chickens
HQ-CR-1 BLM Lease Notice LN for Cultural Resource Protection
HQ-MLA-1 BLM Lease Notice LN for Notice to Lessee Concerning Mineral Leasing Act Section 2(a)(2)(A)
HQ-TES-1 BLM Lease Notice LN for Threatened and Endangered Species Act
NM-1-LN BLM Lease Notice LN for Potential, Suitable, and Occupied Habitat for Special Status Plant Species
NM-11-LN BLM Lease Notice LN for Special Cultural Resource
NM-14-LN BLM Lease Notice LN for Paleontological Resources
SENM-33-NSO BLM Stipulation NSO for Lesser Prairie-Chicken and Dunes Sagebrush Lizard Core Habitat

EOI #NM00019848, NM00020310

NM-2026-05-6873 Split Estate
NMNM106788168

NM, Carlsbad Field Office, BLM, PD
T. 22 S., R. 33 E., New Mexico Principal
Sec. 26 N1/2SE1/4, SE1/4SE1/4.
Lea County
120 Acres
Rental $360.00
12.50% Royalty Rate
Stipulations:
SENM-S-17-CSU BLM Stipulation CSU for Slopes & Fragile Soils
SENM-S-22-CSU BLM Stipulation CSU for Lesser Prairie-Chickens
HQ-CR-1 BLM Lease Notice LN for Cultural Resource Protection
HQ-MLA-1 BLM Lease Notice LN for Notice to Lessee Concerning Mineral Leasing Act Section 2(a)(2)(A)
HQ-TES-1 BLM Lease Notice LN for Threatened and Endangered Species Act
NM-11-LN BLM Lease Notice LN for Special Cultural Resource
NM-14-LN BLM Lease Notice LN for Paleontological Resources
SENM-33-NSO BLM Stipulation NSO for Lesser Prairie-Chicken and Dunes Sagebrush Lizard Core Habitat
EOI #NM00019843

NM-2026-05-6887
NMNM106788169

NM, Carlsbad Field Office, BLM, PD
T. 22 S., R. 33 E., New Mexico Principal
Sec. 27 ALL.
Lea County
640 Acres
Rental $1,920.00
12.50% Royalty Rate
Stipulations:
NM-13-CSU BLM Stipulation CSU for Paleontological Resources
SENM-S-17-CSU BLM Stipulation CSU for Slopes & Fragile Soils
SENM-S-22-CSU BLM Stipulation CSU for Lesser Prairie-Chickens
HQ-CR-1 BLM Lease Notice LN for Cultural Resource Protection
HQ-MLA-1 BLM Lease Notice LN for Notice to Lessee Concerning Mineral Leasing Act Section 2(a)(2)(A)
HQ-TES-1 BLM Lease Notice LN for Threatened and Endangered Species Act
NM-11-LN BLM Lease Notice LN for Special Cultural Resource
NM-14-LN BLM Lease Notice LN for Paleontological Resources
SENM-33-NSO BLM Stipulation NSO for Lesser Prairie-Chicken and Dunes Sagebrush Lizard Core Habitat
EOI #NM00019895

NM-2026-05-0618
NMNM106788170

NM, Carlsbad Field Office, BLM, PD
T. 22 S., R. 33 E., New Mexico Principal
Sec. 28 ALL;
Sec. 29 ALL.
Lea County
1280 Acres
Rental $3,840.00
12.50% Royalty Rate
Stipulations:
NM-13-CSU BLM Stipulation CSU for Paleontological Resources
SENM-S-13-CSU BLM Stipulation CSU for Guadalupe Escarpment
SENM-S-17-CSU BLM Stipulation CSU for Slopes & Fragile Soils
SENM-S-18-CSU BLM Stipulation CSU for Streams, Rivers, and Floodplains
SENM-S-19-CSU BLM Stipulation CSU for Playas and Alkali Lakes
SENM-S-20-CSU BLM Stipulation CSU for Springs, Seeps and Tanks
SENM-S-22-CSU BLM Stipulation CSU for Lesser Prairie-Chickens
HQ-CR-1 BLM Lease Notice LN for Cultural Resource Protection
HQ-MLA-1 BLM Lease Notice LN for Notice to Lessee Concerning Mineral Leasing Act Section 2(a)(2)(A)
HQ-TES-1 BLM Lease Notice LN for Threatened and Endangered Species Act
NM-11-LN BLM Lease Notice LN for Special Cultural Resource
NM-14-LN BLM Lease Notice LN for Paleontological Resources
SENM-33-NSO BLM Stipulation NSO for Lesser Prairie-Chicken and Dunes Sagebrush Lizard Core Habitat
EOI #NM00020281

NM-2026-05-0661
NMNM106788171

NM, Carlsbad Field Office, BLM, PD
T. 22 S., R. 33 E., New Mexico Principal
Sec. 35 SW1/4SW1/4.
Lea County
40 Acres
Rental $120.00
12.50% Royalty Rate
Stipulations:
SENM-S-17-CSU BLM Stipulation CSU for Slopes & Fragile Soils
SENM-S-22-CSU BLM Stipulation CSU for Lesser Prairie-Chickens
HQ-CR-1 BLM Lease Notice LN for Cultural Resource Protection
HQ-MLA-1 BLM Lease Notice LN for Notice to Lessee Concerning Mineral Leasing Act Section 2(a)(2)(A)
HQ-TES-1 BLM Lease Notice LN for Threatened and Endangered Species Act
NM-11-LN BLM Lease Notice LN for Special Cultural Resource

NM-14-LN BLM Lease Notice LN for Paleontological Resources
SENM-33-NSO BLM Stipulation NSO for Lesser Prairie-Chicken and Dunes Sagebrush Lizard Core Habitat
EOI #NM00020870

NM-2026-05-0620
NMNM106788172

NM, Carlsbad Field Office, BLM, PD
T. 23 S., R. 33 E., New Mexico Principal
Sec. 4 LOTS 1 thru 4;
Sec. 4 S1/2NE1/4,S1/2NW1/4,S1/2;
Sec. 5 S1/2NE1/4, E1/2SE1/4.
Lea County
799.2 Acres
Rental $2,400.00
12.50% Royalty Rate
Stipulations:
NM-13-CSU BLM Stipulation CSU for Paleontological Resources
SENM-S-17-CSU BLM Stipulation CSU for Slopes & Fragile Soils
SENM-S-20-CSU BLM Stipulation CSU for Springs, Seeps and Tanks
SENM-S-22-CSU BLM Stipulation CSU for Lesser Prairie-Chickens
HQ-CR-1 BLM Lease Notice LN for Cultural Resource Protection
HQ-MLA-1 BLM Lease Notice LN for Notice to Lessee Concerning Mineral Leasing Act Section 2(a)(2)(A)
HQ-TES-1 BLM Lease Notice LN for Threatened and Endangered Species Act
NM-11-LN BLM Lease Notice LN for Special Cultural Resource
NM-14-LN BLM Lease Notice LN for Paleontological Resources
SENM-33-NSO BLM Stipulation NSO for Lesser Prairie-Chicken and Dunes Sagebrush Lizard Core Habitat
SENM-44-NSO BLM Stipulation NSO for Paleontological Resources
For the following lands:
T. 23 S., R. 33 E., New Mexico Principal, Sec. 4 SE1/4;
EOI #NM00020281

NM-2026-05-0595
NMNM106788173

NM, Carlsbad Field Office, BLM, PD
T. 20 S., R. 34 E., New Mexico Principal
Sec. 15 SW1/4SW1/4.
Lea County
40 Acres
Rental $120.00
12.50% Royalty Rate
Stipulations:
SENM-S-1-CSU BLM Stipulation CSU for Potash Area
SENM-S-17-CSU BLM Stipulation CSU for Slopes & Fragile Soils

SENM-S-22-CSU BLM Stipulation CSU for Lesser Prairie-Chickens
SENM-S-23-CSU BLM Stipulation CSU for Dunes Sagebrush Lizard
SENM-S-34-CSU BLM Stipulation CSU for Shinnery Oak Sand Dune Habitat Complex Plan Of Development
HQ-CR-1 BLM Lease Notice LN for Cultural Resource Protection
HQ-MLA-1 BLM Lease Notice LN for Notice to Lessee Concerning Mineral Leasing Act Section 2(a)(2)(A)
HQ-TES-1 BLM Lease Notice LN for Threatened and Endangered Species Act
NM-1-LN BLM Lease Notice LN for Potential, Suitable, and Occupied Habitat for Special Status Plant Species
NM-11-LN BLM Lease Notice LN for Special Cultural Resource
NM-14-LN BLM Lease Notice LN for Paleontological Resources
SENM-LN-2 BLM Lease Notice LN for Dunes Sagebrush Lizard
SENM-LN-6 BLM Lease Notice LN for Oil and Gas Development Within Designated Potash Area
SENM-33-NSO BLM Stipulation NSO for Lesser Prairie-Chicken and Dunes Sagebrush Lizard Core Habitat

EOI #NM00020136

NM-2026-05-6893 Split Estate
NMNM106788174

NM, Carlsbad Field Office, BLM, PD
T. 22 S., R. 34 E., New Mexico Principal
Sec. 18 LOTS 3,4;
Sec. 18 E1/2SW1/4,W1/2SE1/4;
Sec. 19 LOTS 1 thru 4;
Sec. 19 E1/2NW1/4,E1/2SW1/4.
Lea County
548.12 Acres
Rental $1,647.00
12.50% Royalty Rate
Stipulations:
NM-13-CSU BLM Stipulation CSU for Paleontological Resources
SENM-S-17-CSU BLM Stipulation CSU for Slopes & Fragile Soils
SENM-S-19-CSU BLM Stipulation CSU for Playas and Alkali Lakes
SENM-S-22-CSU BLM Stipulation CSU for Lesser Prairie-Chickens
HQ-CR-1 BLM Lease Notice LN for Cultural Resource Protection
HQ-MLA-1 BLM Lease Notice LN for Notice to Lessee Concerning Mineral Leasing Act Section 2(a)(2)(A)
HQ-TES-1 BLM Lease Notice LN for Threatened and Endangered Species Act
NM-1-LN BLM Lease Notice LN for Potential, Suitable, and Occupied Habitat for Special Status Plant Species
NM-11-LN BLM Lease Notice LN for Special Cultural Resource
NM-14-LN BLM Lease Notice LN for Paleontological Resources
SENM-33-NSO BLM Stipulation NSO for Lesser Prairie-Chicken and Dunes Sagebrush Lizard Core Habitat

EOI #NM00019901, NM00020309

NM-2026-05-6898 Split Estate
NMNM106788175

NM, Carlsbad Field Office, BLM, PD
T. 23 S., R. 35 E., New Mexico Principal
Sec. 1 LOTS 3,4;
Sec. 1 SW1/4NW1/4,SW1/4;
Sec. 12 ALL.
Lea County
920.3 Acres
Rental $2,763.00
12.50% Royalty Rate
Stipulations:
NM-13-CSU BLM Stipulation CSU for Paleontological Resources
SENM-S-17-CSU BLM Stipulation CSU for Slopes & Fragile Soils
SENM-S-20-CSU BLM Stipulation CSU for Springs, Seeps and Tanks
SENM-S-22-CSU BLM Stipulation CSU for Lesser Prairie-Chickens
HQ-CR-1 BLM Lease Notice LN for Cultural Resource Protection
HQ-MLA-1 BLM Lease Notice LN for Notice to Lessee Concerning Mineral Leasing Act Section 2(a)(2)(A)
HQ-TES-1 BLM Lease Notice LN for Threatened and Endangered Species Act
NM-1-LN BLM Lease Notice LN for Potential, Suitable, and Occupied Habitat for Special Status Plant Species
NM-11-LN BLM Lease Notice LN for Special Cultural Resource
NM-14-LN BLM Lease Notice LN for Paleontological Resources
SENM-33-NSO BLM Stipulation NSO for Lesser Prairie-Chicken and Dunes Sagebrush Lizard Core Habitat
SENM-44-NSO BLM Stipulation NSO for Paleontological Resources
For the following lands:
T. 23 S., R. 35 E., New Mexico Principal, Sec. 1 SW1/4; Sec. 12 ALL;
EOI #NM00020390, NM00020392, NM00020393

NM-2026-05-0589
NMNM106788176

NM, Carlsbad Field Office, BLM, PD
T. 23 S., R. 35 E., New Mexico Principal
Sec. 3 LOTS 1 thru 4;
Sec. 3 S1/2NE1/4, S1/2NW1/4, S1/2;
Sec. 10 NE1/4, S1/2.
Lea County
1121.64 Acres
Rental $3,366.00
12.50% Royalty Rate
Stipulations:
NM-13-CSU BLM Stipulation CSU for Paleontological Resources
SENM-S-17-CSU BLM Stipulation CSU for Slopes & Fragile Soils

SENM-S-22-CSU BLM Stipulation CSU for Lesser Prairie-Chickens
HQ-CR-1 BLM Lease Notice LN for Cultural Resource Protection
HQ-MLA-1 BLM Lease Notice LN for Notice to Lessee Concerning Mineral Leasing Act Section 2(a)(2)(A)
HQ-TES-1 BLM Lease Notice LN for Threatened and Endangered Species Act
NM-11-LN BLM Lease Notice LN for Special Cultural Resource
NM-14-LN BLM Lease Notice LN for Paleontological Resources
SENM-33-NSO BLM Stipulation NSO for Lesser Prairie-Chicken and Dunes Sagebrush Lizard Core Habitat
SENM-44-NSO BLM Stipulation NSO for Paleontological Resources
For the following lands:
T. 23 S., R. 35 E., New Mexico Principal, Sec. 10 E1/2;
EOI #NM00019870, NM00019871

NM-2026-05-0633 Split Estate
NMNM106788177

NM, Carlsbad Field Office, BLM, PD
T. 23 S., R. 35 E., New Mexico Principal
Sec. 11 ALL;
Sec. 14 N1/2,N1/2SW1/4,SE1/4SW1/4,SE1/4.
Lea County
1240 Acres
Rental $3,720.00
12.50% Royalty Rate
Stipulations:
NM-13-CSU BLM Stipulation CSU for Paleontological Resources
SENM-S-17-CSU BLM Stipulation CSU for Slopes & Fragile Soils
SENM-S-22-CSU BLM Stipulation CSU for Lesser Prairie-Chickens
HQ-CR-1 BLM Lease Notice LN for Cultural Resource Protection
HQ-MLA-1 BLM Lease Notice LN for Notice to Lessee Concerning Mineral Leasing Act Section 2(a)(2)(A)
HQ-TES-1 BLM Lease Notice LN for Threatened and Endangered Species Act
NM-1-LN BLM Lease Notice LN for Potential, Suitable, and Occupied Habitat for Special Status Plant Species
NM-11-LN BLM Lease Notice LN for Special Cultural Resource
NM-14-LN BLM Lease Notice LN for Paleontological Resources
SENM-33-NSO BLM Stipulation NSO for Lesser Prairie-Chicken and Dunes Sagebrush Lizard Core Habitat
SENM-44-NSO BLM Stipulation NSO for Paleontological Resources
For the following lands:
T. 23 S., R. 35 E., New Mexico Principal, Sec. 11 ALL; Sec. 14 N1/2,N1/2SW1/4,SE1/4SW1/4;
EOI #NM00020391, NM00020395

NM-2026-05-6899 Split Estate
NMNM106788178

NM, Carlsbad Field Office, BLM, PD
T. 23 S., R. 35 E., New Mexico Principal
Sec. 13 ALL;
Sec. 24 ALL.
Lea County
1280 Acres
Rental $3,840.00
12.50% Royalty Rate
Stipulations:
NM-13-CSU BLM Stipulation CSU for Paleontological Resources
SENM-S-17-CSU BLM Stipulation CSU for Slopes & Fragile Soils
SENM-S-22-CSU BLM Stipulation CSU for Lesser Prairie-Chickens
HQ-CR-1 BLM Lease Notice LN for Cultural Resource Protection
HQ-MLA-1 BLM Lease Notice LN for Notice to Lessee Concerning Mineral Leasing Act Section 2(a)(2)(A)
HQ-TES-1 BLM Lease Notice LN for Threatened and Endangered Species Act
NM-1-LN BLM Lease Notice LN for Potential, Suitable, and Occupied Habitat for Special Status Plant Species
NM-11-LN BLM Lease Notice LN for Special Cultural Resource
NM-14-LN BLM Lease Notice LN for Paleontological Resources
SENM-33-NSO BLM Stipulation NSO for Lesser Prairie-Chicken and Dunes Sagebrush Lizard Core Habitat
SENM-44-NSO BLM Stipulation NSO for Paleontological Resources
For the following lands:
T. 23 S., R. 35 E., New Mexico Principal, Sec. 13 All;
EOI #NM00020394, NM00020398

NM-2026-05-0584 Split Estate
NMNM106788179

NM, Carlsbad Field Office, BLM, PD
T. 23 S., R. 35 E., New Mexico Principal
Sec. 15 NE1/4,W1/2,SW1/4SE1/4;
Sec. 22 NW1/4NE1/4,S1/2NE1/4,W1/2,SE1/4;
Sec. 27 ALL.
Lea County
1760 Acres
Rental $5,280.00
12.50% Royalty Rate
Stipulations:
NM-13-CSU BLM Stipulation CSU for Paleontological Resources
SENM-S-17-CSU BLM Stipulation CSU for Slopes & Fragile Soils
SENM-S-22-CSU BLM Stipulation CSU for Lesser Prairie-Chickens
HQ-CR-1 BLM Lease Notice LN for Cultural Resource Protection
HQ-MLA-1 BLM Lease Notice LN for Notice to Lessee Concerning Mineral Leasing Act Section 2(a)(2)(A)

HQ-TES-1 BLM Lease Notice LN for Threatened and Endangered Species Act
NM-11-LN BLM Lease Notice LN for Special Cultural Resource
NM-14-LN BLM Lease Notice LN for Paleontological Resources
SENM-33-NSO BLM Stipulation NSO for Lesser Prairie-Chicken and Dunes Sagebrush Lizard Core Habitat
SENM-44-NSO BLM Stipulation NSO for Paleontological Resources
For the following lands:
T. 23 S., R. 35 E., New Mexico Principal, Sec. 15 NE1/4,W1/2,SW1/4SE1/4; Sec. 22 NW1/4NE1/4,S1/2NE1/4,W1/2,SE1/4; Sec. 27 NE¼, NW¼, SW¼;
EOI #NM00019229, NM00020396, NM00020401

NM-2026-05-0637 Split Estate
NMNM106788180

NM, Carlsbad Field Office, BLM, PD
T. 23 S., R. 35 E., New Mexico Principal
Sec. 23 NE1/4NE1/4,S1/2NE1/4,S1/2NW1/4,S1/2;
Sec. 26 ALL.
Lea County
1160 Acres
Rental $3,480.00
12.50% Royalty Rate
Stipulations:
SENM-S-13-CSU BLM Stipulation CSU for Guadalupe Escarpment
SENM-S-17-CSU BLM Stipulation CSU for Slopes & Fragile Soils
SENM-S-22-CSU BLM Stipulation CSU for Lesser Prairie-Chickens
HQ-CR-1 BLM Lease Notice LN for Cultural Resource Protection
HQ-MLA-1 BLM Lease Notice LN for Notice to Lessee Concerning Mineral Leasing Act Section 2(a)(2)(A)
HQ-TES-1 BLM Lease Notice LN for Threatened and Endangered Species Act
NM-11-LN BLM Lease Notice LN for Special Cultural Resource
NM-14-LN BLM Lease Notice LN for Paleontological Resources
SENM-33-NSO BLM Stipulation NSO for Lesser Prairie-Chicken and Dunes Sagebrush Lizard Core Habitat
SENM-44-NSO BLM Stipulation NSO for Paleontological Resources
For the following lands:
T. 23 S., R. 35 E., New Mexico Principal, Sec. 23 NW1/4;
EOI #NM00020397, NM00020400

NM-2026-05-6900 Split Estate
NMNM106788181

NM, Carlsbad Field Office, BLM, PD
T. 23 S., R. 35 E., New Mexico Principal
Sec. 25 ALL.
Lea County
640 Acres
Rental $1,920.00
12.50% Royalty Rate
Stipulations:
NM-13-CSU BLM Stipulation CSU for Paleontological Resources
SENM-S-17-CSU BLM Stipulation CSU for Slopes & Fragile Soils
SENM-S-22-CSU BLM Stipulation CSU for Lesser Prairie-Chickens
HQ-CR-1 BLM Lease Notice LN for Cultural Resource Protection
HQ-MLA-1 BLM Lease Notice LN for Notice to Lessee Concerning Mineral Leasing Act Section 2(a)(2)(A)
HQ-TES-1 BLM Lease Notice LN for Threatened and Endangered Species Act
NM-11-LN BLM Lease Notice LN for Special Cultural Resource
NM-14-LN BLM Lease Notice LN for Paleontological Resources
SENM-33-NSO BLM Stipulation NSO for Lesser Prairie-Chicken and Dunes Sagebrush Lizard Core Habitat
EOI #NM00020399

NM-2026-05-0636 Split Estate
NMNM106788182

NM, Carlsbad Field Office, BLM, PD
T. 23 S., R. 36 E., New Mexico Principal
Sec. 19 LOTS 1 thru 4;
Sec. 19 E1/2,E1/2NW1/4,E1/2SW1/4;
Sec. 30 LOTS 1 thru 4;
Sec. 30 E1/2,E1/2NW1/4,E1/2SW1/4.
Lea County
1268.24 Acres
Rental $3,807.00
12.50% Royalty Rate
Stipulations:
NM-13-CSU BLM Stipulation CSU for Paleontological Resources
SENM-S-17-CSU BLM Stipulation CSU for Slopes & Fragile Soils
SENM-S-22-CSU BLM Stipulation CSU for Lesser Prairie-Chickens
HQ-CR-1 BLM Lease Notice LN for Cultural Resource Protection
HQ-MLA-1 BLM Lease Notice LN for Notice to Lessee Concerning Mineral Leasing Act Section 2(a)(2)(A)
HQ-TES-1 BLM Lease Notice LN for Threatened and Endangered Species Act
NM-11-LN BLM Lease Notice LN for Special Cultural Resource
NM-14-LN BLM Lease Notice LN for Paleontological Resources
SENM-33-NSO BLM Stipulation NSO for Lesser Prairie-Chicken and Dunes Sagebrush Lizard Core Habitat

EOI #NM00020402, NM00020403

NM-2026-05-0638 Split Estate
NMNM106788183

NM, Carlsbad Field Office, BLM, PD
T. 23 S., R. 36 E., New Mexico Principal
Sec. 31 LOTS 3,4;
Sec. 31 E1/2SW1/4.
Lea County
158.16 Acres
Rental $477.00
12.50% Royalty Rate
Stipulations:
SENM-S-17-CSU BLM Stipulation CSU for Slopes & Fragile Soils
SENM-S-22-CSU BLM Stipulation CSU for Lesser Prairie-Chickens
HQ-CR-1 BLM Lease Notice LN for Cultural Resource Protection
HQ-MLA-1 BLM Lease Notice LN for Notice to Lessee Concerning Mineral Leasing Act Section 2(a)(2)(A)
HQ-TES-1 BLM Lease Notice LN for Threatened and Endangered Species Act
NM-11-LN BLM Lease Notice LN for Special Cultural Resource
NM-14-LN BLM Lease Notice LN for Paleontological Resources
EOI #NM00020404

Texas

TX-2026-05-0103 Split Estate
TXNM106788184

TX, Oklahoma Field Office, BOR:Nueces River Project Office, ACQ
Texas
Sec. 1 TR TR 311 NR-87-2;
Sec. 1 TR TR 311 NR-87-1.
McMullen County
155.64 Acres
Rental $468.00
12.5% Royalty Rate
Stipulations:
OFO-1-CSU BLM Stipulation CSU for Lands with Sensitive Soils
HQ-CR-1 BLM Lease Notice LN for Cultural Resource Protection
HQ-MLA-1 BLM Lease Notice LN for Notice to Lessee Concerning Mineral Leasing Act Section 2(a)(2)(A)
HQ-TES-1 BLM Lease Notice LN for Threatened and Endangered Species Act
NM-11-LN BLM Lease Notice LN for Special Cultural Resource
NM-14-LN BLM Lease Notice LN for Paleontological Resources
OFO-4-LN BLM Lease Notice LN for Migratory Birds and Birds of Conservation Concern
OFO-8-LN BLM Lease Notice LN for Cultural Resources and Tribal Consultation

BOR-Fed Mins-NSO-1 SMA Stipulation for Bureau of Reclamation Oklahoma - Texas Area Office Interim Stipulations - Federal Minerals Nueces River Project
EOI #NM00016023, NM00020090

Parcels

Wyoming

WY-2026-06-2247 Split Estate
WYWY106788823
WY, Newcastle Field Office, BLM, PD
T. 40 N., R. 63 W., Sixth Principal
Sec. 6 LOTS 2, 3, 5;
Sec. 6 SW1/4NE1/4, SE1/4NW1/4.
Niobrara County
214.45 Acres
Rental $645.00
12.50% Royalty Rate

Stipulations:

WY STD LEASE STIPULATION NO. 3 BLM Stipulation for Multiple Mineral Development
HQ-CR-1 BLM Lease Notice LN for Cultural Resource Protection
HQ-MLA-1 BLM Lease Notice LN for Notice to Lessee Concerning Mineral Leasing Act Section 2(a)(2)(A)
HQ-TES-1 BLM Lease Notice LN for Threatened and Endangered Species Act
WY STD LEASE NOTICE NO 1 BLM Lease Notice LN for Reasonable Measures to Minimize Adverse Impacts to Resources
WY STD LEASE NOTICE NO. 2 BLM Lease Notice LN for National Historic Trails
WY STD LEASE NOTICE NO. 3 BLM Lease Notice LN for Greater Sage-Grouse Habitat
WY STD NOTICE TO LESSEE BLM Lease Notice LN for Attachment to Each Lease. Mineral Leasing Act requirements with respect to coal leasing
WY NFO_TLS_RN BLM Stipulation TL for Raptor Nests

EOI #WY00020148

WY-2026-06-2251 Split Estate
WYWY106788824
WY, Newcastle Field Office, BLM, PD
T. 40 N., R. 63 W., Sixth Principal
Sec. 8 SW1/4.
Niobrara County
160 Acres
Rental $480.00
12.50% Royalty Rate

Agreements:

WYWY105380890 This parcel is within approved Unit Agreement (UA) WYWY105380890, effective August 12, 2016. Before the issuance of a lease for lands within approved unit, the successful bidder may be required to join the unit (43 CFR 3101.3-1). Any lands included in this Notice that are determined to be in a unit prior to lease issuance are subject to regulation (43 CFR 3101.3-1)

Stipulations:

WY STD LEASE STIPULATION NO. 3 BLM Stipulation for Multiple Mineral Development
HQ-CR-1 BLM Lease Notice LN for Cultural Resource Protection
HQ-MLA-1 BLM Lease Notice LN for Notice to Lessee Concerning Mineral Leasing Act Section 2(a)(2)(A)
HQ-TES-1 BLM Lease Notice LN for Threatened and Endangered Species Act
WY STD LEASE NOTICE NO 1 BLM Lease Notice LN for Reasonable Measures to Minimize Adverse Impacts to Resources
WY STD LEASE NOTICE NO. 2 BLM Lease Notice LN for National Historic Trails
WY STD LEASE NOTICE NO. 3 BLM Lease Notice LN for Greater Sage-Grouse Habitat
WY STD NOTICE TO LESSEE BLM Lease Notice LN for Attachment to Each Lease. Mineral Leasing Act requirements with respect to coal leasing

EOI #WY00020180

WY-2026-06-7081
WYWY106788825
WY, Newcastle Field Office, FS:Thunder Basin National Grasslands, PD
T. 42 N., R. 63 W., Sixth Principal
Sec. 3 S1/2;
Sec. 8 S1/2.
Weston County
640 Acres
Rental $1,920.00
12.50% Royalty Rate

Stipulations:
WY STD LEASE STIPULATION NO. 3 BLM Stipulation for Multiple Mineral Development
HQ-CR-1 BLM Lease Notice LN for Cultural Resource Protection
HQ-MLA-1 BLM Lease Notice LN for Notice to Lessee Concerning Mineral Leasing Act Section 2(a)(2)(A)
HQ-TES-1 BLM Lease Notice LN for Threatened and Endangered Species Act
WY STD LEASE NOTICE NO. 1 BLM Lease Notice LN for Reasonable Measures to Minimize Adverse Impacts to Resources
WY STD LEASE NOTICE NO. 2 BLM Lease Notice LN for National Historic Trails
WY STD LEASE NOTICE NO. 3 BLM Lease Notice LN for Greater Sage-Grouse Habitat
WY STD NOTICE TO LESSEE BLM Lease Notice LN for Attachment to Each Lease. Mineral Leasing Act requirements with respect to coal leasing
TBNG2002-CSU-03 SMA Stipulation for Fossils
TBNG2002-NSO-02 SMA Stipulation for Slopes Between 25-40%
For the following lands:
T. 42 N., R. 63 W., Sixth Principal, Sec. 3 S1/2 (PORTIONS OF S1/2); Sec. 8 S1/2 (PORTIONS OF NE1/4SW1/4, S1/2SW1/4, W1/2SE1/4);
TBNG2002-NSO-06 SMA Stipulation for Golden Eagle, Merlin, Ferruginous Hawk, Swainson's Hawk, and Burrowing Owl Nests
For the following lands:
T. 42 N., R. 63 W., Sixth Principal, Sec. 3 S1/2 (PORTIONS OF SW1/4SW1/4); Sec. 8 S1/2;
TBNG2002-TL-01 SMA Stipulation for Ferruginous & Swainson's Hawk Nests
For the following lands:
T. 42 N., R. 63 W., Sixth Principal, Sec. 3 S1/2 (SW1/4SW1/4; PORTIONS OF N1/2SW1/4, SE1/4SW1/4); Sec. 8 S1/2 (PORTIONS OF S1/2SW1/4, SW1/4SE1/4);
TBNG-R2-FS-2820-13 Lease Notice SMA Stipulation for Notice for Lands of the National Forest System Under Jurisdiction of Department of Agriculture
EOI #WY00016681
FS Parcel#TB - 1101

WY-2026-06-7016
WYWY106788826
WY, Newcastle Field Office, FS:Thunder Basin National Grasslands, ACQ
T. 48 N., R. 65 W., Sixth Principal
Sec. 8 W1/2NE1/4, NW1/4SE1/4;
Sec. 17 SW1/4NW1/4, N1/2SW1/4, SE1/4SW1/4, SE1/4.
Weston County
440 Acres
Rental $1,320.00
12.50% Royalty Rate

Stipulations:
WY STD LEASE STIPULATION NO. 3 BLM Stipulation for Multiple Mineral Development
HQ-CR-1 BLM Lease Notice LN for Cultural Resource Protection
HQ-MLA-1 BLM Lease Notice LN for Notice to Lessee Concerning Mineral Leasing Act Section 2(a)(2)(A)
HQ-TES-1 BLM Lease Notice LN for Threatened and Endangered Species Act
WY STD LEASE NOTICE NO. 1 BLM Lease Notice LN for Reasonable Measures to Minimize Adverse Impacts to Resources
WY STD LEASE NOTICE NO. 2 BLM Lease Notice LN for National Historic Trails
WY STD LEASE NOTICE NO. 3 BLM Lease Notice LN for Greater Sage-Grouse Habitat
WY STD NOTICE TO LESSEE BLM Lease Notice LN for Attachment to Each Lease. Mineral Leasing Act requirements with respect to coal leasing
TBNG2002-CSU-03 SMA Stipulation for Fossils
TBNG2002-CSU-07 SMA Stipulation for Scenery - Moderate Scenic Integrity Objective Areas
For the following lands:
T. 48 N., R. 65 W., Sixth Principal, Sec. 8 W1/2NE1/4, NW1/4SE1/4 ; Sec. 17 SW1/4NW1/4, N1/2SW1/4, SE1/4SW1/4, SE1/4;
TBNG2002-NSO-02 SMA Stipulation for Slopes Between 25-40%
For the following lands:
T. 48 N., R. 65 W., Sixth Principal, Sec. 8 W1/2NE1/4, NW1/4SE1/4 (PORTIONS OF NW1/4SE1/4); Sec. 17 SW1/4NW1/4, N1/2SW1/4, SE1/4SW1/4, SE1/4;
TBNG2002-TL-01 SMA Stipulation for Ferruginous & Swainson's Hawk Nests
For the following lands:
T. 48 N., R. 65 W., Sixth Principal, Sec. 8 W1/2NE1/4, NW1/4SE1/4; Sec. 17 SW1/4NW1/4, N1/2SW1/4, SE1/4SW1/4, SE1/4 (PORTIONS OF SW1/4NW1/4);
TBNG-R2-FS-2820-13 Lease Notice SMA Stipulation for Notice for Lands of the National Forest System Under Jurisdiction of Department of Agriculture
EOI #WY00016628
FS Parcel#TBNG-0480N-0650W-0004

WY-2026-06-7020
WYWY106788827
WY, Newcastle Field Office, FS:Thunder Basin National Grasslands, PD
T. 48 N., R. 66 W., Sixth Principal
Sec. 4 SW1/4NW1/4;
Sec. 5 SE1/4NE1/4.
Weston County
80 Acres
Rental $240.00
12.50% Royalty Rate

Stipulations:

WY STD LEASE STIPULATION NO. 3 BLM Stipulation for Multiple Mineral Development
HQ-CR-1 BLM Lease Notice LN for Cultural Resource Protection
HQ-MLA-1 BLM Lease Notice LN for Notice to Lessee Concerning Mineral Leasing Act Section 2(a)(2)(A)
HQ-TES-1 BLM Lease Notice LN for Threatened and Endangered Species Act
WY STD LEASE NOTICE NO. 1 BLM Lease Notice LN for Reasonable Measures to Minimize Adverse Impacts to Resources
WY STD LEASE NOTICE NO. 2 BLM Lease Notice LN for National Historic Trails
WY STD LEASE NOTICE NO. 3 BLM Lease Notice LN for Greater Sage-Grouse Habitat
WY STD NOTICE TO LESSEE BLM Lease Notice LN for Attachment to Each Lease. Mineral Leasing Act requirements with respect to coal leasing
TBNG2002-CSU-03 SMA Stipulation for Fossils
TBNG-R2-FS-2820-13 Lease Notice SMA Stipulation for Notice for Lands of the National Forest System Under Jurisdiction of Department of Agriculture

EOI #WY00016624
FS Parcel#TB - 1052

WY-2026-06-0934
WYWY106788828
WY, Newcastle Field Office, FS:Thunder Basin National Grasslands, PD
T. 48 N., R. 66 W., Sixth Principal
Sec. 13 NENE (EXC 1.30 AC IN RR WYW0119068);
Sec. 13 NW1/4NE1/4, SE1/4NE1/4.
Weston County
118.7 Acres
Rental $357.00
12.50% Royalty Rate
Stipulations:

WY STD LEASE STIPULATION NO. 3 BLM Stipulation for Multiple Mineral Development
HQ-CR-1 BLM Lease Notice LN for Cultural Resource Protection
HQ-MLA-1 BLM Lease Notice LN for Notice to Lessee Concerning Mineral Leasing Act Section 2(a)(2)(A)
HQ-TES-1 BLM Lease Notice LN for Threatened and Endangered Species Act
WY STD LEASE NOTICE NO. 1 BLM Lease Notice LN for Reasonable Measures to Minimize Adverse Impacts to Resources
WY STD LEASE NOTICE NO. 2 BLM Lease Notice LN for National Historic Trails
WY STD LEASE NOTICE NO. 3 BLM Lease Notice LN for Greater Sage-Grouse Habitat
WY STD NOTICE TO LESSEE BLM Lease Notice LN for Attachment to Each Lease. Mineral Leasing Act requirements with respect to coal leasing
TBNG2002-CSU-03 SMA Stipulation for Fossils
TBNG2002-CSU-07 SMA Stipulation for Scenery - Moderate Scenic Integrity Objective Areas
TBNG2002-NSO-01 SMA Stipulation for Slopes > 40%
For the following lands:
T. 48 N., R. 66 W., Sixth Principal, Sec. 13 NW1/4NE1/4,SE1/4NE1/4 (PORTIONS OF NW1/4NE1/4, SE1/4NE1/4), NE1/4NE1/4 (EXCL 1.30 AC IN RR ROW WYW0119068);
TBNG2002-NSO-02 SMA Stipulation for Slopes Between 25-40%
For the following lands:
T. 48 N., R. 66 W., Sixth Principal, Sec. 13 NW1/4NE1/4,SE1/4NE1/4 (PORTIONS OF NW1/4NE1/4, SE1/4NE1/4), NE1/4NE1/4 (EXCL 1.30 AC IN RR ROW WYW0119068)nPORTIONS OF NE1/4NE1/4 EXCL 1.30 AC IN RR ROW WYW0119068;;
TBNG2002-NSO-06 SMA Stipulation for Golden Eagle, Merlin, Ferruginous Hawk, Swainson's Hawk, and Burrowing Owl Nests
For the following lands:
T. 48 N., R. 66 W., Sixth Principal, Sec. 13 NW1/4NE1/4,SE1/4NE1/4 (PORTIONS OF NW1/4NE1/4, SE1/4NE1/4)n, NE1/4NE1/4 (EXCL 1.30 AC IN RR ROW WYW0119068)n(PORTIONS OF NE1/4NE1/4 EXCL 1.30 AC IN RR ROW WYW0119068);
TBNG2002-TL-02 SMA Stipulation for Golden Eagle Nests
For the following lands:
T. 48 N., R. 66 W., Sixth Principal, Sec. 13 NW1/4NE1/4,SE1/4NE1/4 (NW1/4NE1/4, SE1/4NE1/4), NE1/4NE1/4 (EXCL 1.30 AC IN RR ROW WYW0119068)n(NE1/4NE1/4 EXCL 1.30 AC IN RR ROW WYW0119068);
TBNG-R2-FS-2820-13 Lease Notice SMA Stipulation for Notice for Lands of the National Forest System Under Jurisdiction of Department of Agriculture

EOI #WY00016629
FS Parcel#TBNG-0480N-0660W-0003

WY-2026-06-2279 Split Estate
WYWY106788829
WY, Casper Field Office, BLM, PD
T. 33 N., R. 67 W., Sixth Principal
Sec. 6 LOTS 1;
Sec. 6 NE1/4SE1/4, SW1/4SE1/4;
Sec. 8 NE1/4SW1/4, N1/2SE1/4;
Sec. 17 NW1/4SW1/4.
Converse County
280.17 Acres
Rental $843.00
12.50% Royalty Rate

Stipulations:

WY STD LEASE STIPULATION NO. 3 BLM Stipulation for Multiple Mineral Development
HQ-CR-1 BLM Lease Notice LN for Cultural Resource Protection
HQ-MLA-1 BLM Lease Notice LN for Notice to Lessee Concerning Mineral Leasing Act Section 2(a)(2)(A)
HQ-TES-1 BLM Lease Notice LN for Threatened and Endangered Species Act
WY STD LEASE NOTICE NO 1 BLM Lease Notice LN for Reasonable Measures to Minimize Adverse Impacts to Resources
WY STD LEASE NOTICE NO. 2 BLM Lease Notice LN for National Historic Trails
WY STD LEASE NOTICE NO. 3 BLM Lease Notice LN for Greater Sage-Grouse Habitat
WY STD NOTICE TO LESSEE BLM Lease Notice LN for Attachment to Each Lease. Mineral Leasing Act requirements with respect to coal leasing
WY SW_NSO_GHMAL BLM Stipulation NSO for Greater Sage-Grouse Leks. Within 0.25-mile radius of occupied leks outside Priority Habitat Management Areas
WY CFO_TLS_NR BLM Stipulation TL for Nesting Raptors
WY SW_TLS_GHMAL BLM Stipulation TL for Greater Sage-Grouse breeding, nesting, etc. Within 2 miles of an occupied lek outside Priority Habitat Management Areas

EOI #WY00020315

WY-2026-06-2252 Split Estate
WYWY106788830
WY, Casper Field Office, BLM, PD
T. 32 N., R. 68 W., Sixth Principal
Sec. 5 W1/2SE1/4.
Converse County
80 Acres
Rental $240.00
12.50% Royalty Rate

Stipulations:

WY STD LEASE STIPULATION NO. 3 BLM Stipulation for Multiple Mineral Development
HQ-CR-1 BLM Lease Notice LN for Cultural Resource Protection
HQ-MLA-1 BLM Lease Notice LN for Notice to Lessee Concerning Mineral Leasing Act Section 2(a)(2)(A)
HQ-TES-1 BLM Lease Notice LN for Threatened and Endangered Species Act
WY STD LEASE NOTICE NO 1 BLM Lease Notice LN for Reasonable Measures to Minimize Adverse Impacts to Resources
WY STD LEASE NOTICE NO. 2 BLM Lease Notice LN for National Historic Trails
WY STD LEASE NOTICE NO. 3 BLM Lease Notice LN for Greater Sage-Grouse Habitat
WY STD NOTICE TO LESSEE BLM Lease Notice LN for Attachment to Each Lease. Mineral Leasing Act requirements with respect to coal leasing
WY CFO_TLS_NR BLM Stipulation TL for Nesting Raptors

EOI #WY00020314

WY-2026-06-2269 Split Estate
WYWY106788831
WY, Casper Field Office, BLM, PD
T. 34 N., R. 68 W., Sixth Principal
Sec. 15 SE1/4SE1/4.
Converse County
40 Acres
Rental $120.00
12.50% Royalty Rate

Stipulations:

WY STD LEASE STIPULATION NO. 3 BLM Stipulation for Multiple Mineral Development
HQ-CR-1 BLM Lease Notice LN for Cultural Resource Protection
HQ-MLA-1 BLM Lease Notice LN for Notice to Lessee Concerning Mineral Leasing Act Section 2(a)(2)(A)
HQ-TES-1 BLM Lease Notice LN for Threatened and Endangered Species Act
WY STD LEASE NOTICE NO 1 BLM Lease Notice LN for Reasonable Measures to Minimize Adverse Impacts to Resources
WY STD LEASE NOTICE NO. 2 BLM Lease Notice LN for National Historic Trail
WY STD LEASE NOTICE NO. 3 BLM Lease Notice LN for Greater Sage-Grouse Habitat
WY STD NOTICE TO LESSEE BLM Lease Notice LN for Attachment to Each Lease. Mineral Leasing Act requirements with respect to coal leasing
WY CFO_TLS_NR BLM Stipulation TL for Nesting Raptors

EOI #WY00020407

WY-2026-06-2278 Split Estate
WYWY106788832
WY, Casper Field Office, BLM, PD
T. 37 N., R. 70 W., Sixth Principal
Sec. 3 NW1/4SE1/4;
Sec. 4 LOTS 3, 4.
Converse County
117.85 Acres
Rental $354.00
12.50% Royalty Rate

Stipulations:

WY STD LEASE STIPULATION NO. 3 BLM Stipulation for Multiple Mineral Development
HQ-CR-1 BLM Lease Notice LN for Cultural Resource Protection
HQ-MLA-1 BLM Lease Notice LN for Notice to Lessee Concerning Mineral Leasing Act Section 2(a)(2)(A)
HQ-TES-1 BLM Lease Notice LN for Threatened and Endangered Species Act
WY STD LEASE NOTICE NO 1 BLM Lease Notice LN for Reasonable Measures to Minimize Adverse Impacts to Resources
WY STD LEASE NOTICE NO. 2 BLM Lease Notice LN for National Historic Trails
WY STD LEASE NOTICE NO. 3 BLM Lease Notice LN for Greater Sage-Grouse Habitat
WY STD NOTICE TO LESSEE BLM Lease Notice LN for Attachment to Each Lease. Mineral Leasing Act requirements with respect to coal leasing
WY CFO_TLS_NR BLM Stipulation TL for Nesting Raptors

EOI #WY00020316

WY-2026-06-7467 Split Estate
WYWY106788833
WY, Casper Field Office, BLM, PD
T. 37 N., R. 70 W., Sixth Principal
Sec. 11 W1/2.
Converse County
320 Acres
Rental $960.00
12.50% Royalty Rate

Stipulations:

WY STD LEASE STIPULATION NO. 3 BLM Stipulation for Multiple Mineral Development
HQ-CR-1 BLM Lease Notice LN for Cultural Resource Protection
HQ-MLA-1 BLM Lease Notice LN for Notice to Lessee Concerning Mineral Leasing Act Section 2(a)(2)(A)
HQ-TES-1 BLM Lease Notice LN for Threatened and Endangered Species Act
WY STD LEASE NOTICE NO 1 BLM Lease Notice LN for Reasonable Measures to Minimize Adverse Impacts to Resources
WY STD LEASE NOTICE NO. 2 BLM Lease Notice LN for National Historic Trails
WY STD LEASE NOTICE NO. 3 BLM Lease Notice LN for Greater Sage-Grouse Habitat
WY STD NOTICE TO LESSEE BLM Lease Notice LN for Attachment to Each Lease. Mineral Leasing Act requirements with respect to coal leasing
WY CFO_TLS_NR BLM Stipulation TL for Nesting Raptors

EOI #WY00020152

WY-2026-06-7468 Split Estate
WYWY106788834
WY, Casper Field Office, BLM, PD
T. 37 N., R. 70 W., Sixth Principal
Sec. 24 E1/2SE1/4.
Converse County
80 Acres
Rental $240.00
12.50% Royalty Rate

Stipulations:

WY STD LEASE STIPULATION NO. 3 BLM Stipulation for Multiple Mineral Developmen
HQ-CR-1 BLM Lease Notice LN for Cultural Resource Protection
HQ-MLA-1 BLM Lease Notice LN for Notice to Lessee Concerning Mineral Leasing Act Section 2(a)(2)(A)
HQ-TES-1 BLM Lease Notice LN for Threatened and Endangered Species Act
WY STD LEASE NOTICE NO 1 BLM Lease Notice LN for Reasonable Measures to Minimize Adverse Impacts to Resources
WY STD LEASE NOTICE NO. 2 BLM Lease Notice LN for National Historic Trails
WY STD LEASE NOTICE NO. 3 BLM Lease Notice LN for Greater Sage-Grouse Habitat
WY STD NOTICE TO LESSEE BLM Lease Notice LN for Attachment to Each Lease. Mineral Leasing Act requirements with respect to coal leasing
WY CFO_TLS_NR BLM Stipulation TL for Nesting Raptors

EOI #WY00020153

WY-2026-06-1662 Split Estate
WYWY106788835
WY, Buffalo Field Office, BLM, PD
T. 41 N., R. 70 W., Sixth Principal
Sec. 15 LOTS 1 thru 6;
Sec. 20 LOTS 1 thru 16;
Sec. 23 LOTS 1 thru 8.
Campbell County
1206.57 Acres
Rental $3,621.00
12.50% Royalty Rate

Stipulations:

WY STD LEASE STIPULATION NO. 3 BLM Stipulation for Multiple Mineral Development
WY BFO_CSU_CLBA2007 BLM Stipulation CSU for Coal Lease By Application Areas
WY BFO_CSU_FQM4013 BLM Stipulation CSU for Fish Populations and Habitat
WY BFO_CSU_PD4009 BLM Stipulation CSU for Prairie Dog Colonies
WY BFO_CSU_RN4028 BLM Stipulation CSU for Raptor Nests (Non-Special Status Species)
WY BFO_CSU_SE1004 BLM Stipulation CSU for Severe Erosion Hazard
WY BFO_CSU_SLOPES25to501006 BLM Stipulation CSU for Slopes Greater than 25% and Less than 50%
WY BFO_CSU_SLR1010 BLM Stipulation CSU for Limited Reclamation Potential Areas
WY BFO_CSU_SSWLA4034 BLM Stipulation CSU for Amphibian Species Breeding, Sheltering, and Hibernation Habitat
WY BFO_CSU_SSWLB4034 BLM Stipulation CSU for Bat Species Breeding, Nursery, Roosting, and Hibernation Habitat
WY BFO_CSU_SSWLH4007 BLM Stipulation CSU for Wildlife Habitat for Special Status Species
HQ-CR-1 BLM Lease Notice LN for Cultural Resource Protection
HQ-MLA-1 BLM Lease Notice LN for Notice to Lessee Concerning Mineral Leasing Act Section 2(a)(2)(A)
HQ-TES-1 BLM Lease Notice LN for Threatened and Endangered Species Act
WY STD LEASE NOTICE NO 1 BLM Lease Notice LN for Reasonable Measures to Minimize Adverse Impacts to Resources
WY STD LEASE NOTICE NO. 2 BLM Lease Notice LN for National Historic Trails
WY STD LEASE NOTICE NO. 3 BLM Lease Notice LN for Greater Sage-Grouse Habitat
WY STD NOTICE TO LESSEE BLM Lease Notice LN for Attachment to Each Lease. Mineral Leasing Act requirements with respect to coal leasing
WY BFO_TLS_NSSRN4030 BLM Stipulation TL for Raptor Nests (Non-Special Status Species)

EOI #WY00015687, WY00018317

WY-2026-06-2262
WYWY106788836
WY, Buffalo Field Office, BLM, PD
T. 43 N., R. 70 W., Sixth Principal
Sec. 19 LOTS 7 thru 10.
Campbell County
158 Acres
Rental $474.00
12.50% Royalty Rate

Stipulations:

WY STD LEASE STIPULATION NO. 3 BLM Stipulation for Multiple Mineral Development
WY BFO_CSU_CLBA2007 BLM Stipulation CSU for Coal Lease By Application Areas
WY BFO_CSU_SSWLA4034 BLM Stipulation CSU for Amphibian Species Breeding, Sheltering, and Hibernation Habitat
WY BFO_CSU_SSWLH4007 BLM Stipulation CSU for Wildlife Habitat for Special Status Species
HQ-CR-1 BLM Lease Notice LN for Cultural Resource Protection
HQ-MLA-1 BLM Lease Notice LN for Notice to Lessee Concerning Mineral Leasing Act Section 2(a)(2)(A)
HQ-TES-1 BLM Lease Notice LN for Threatened and Endangered Species Act
WY STD LEASE NOTICE NO 1 BLM Lease Notice LN for Reasonable Measures to Minimize Adverse Impacts to Resources
WY STD LEASE NOTICE NO. 2 BLM Lease Notice LN for National Historic Trails
WY STD LEASE NOTICE NO. 3 BLM Lease Notice LN for Greater Sage-Grouse Habitat
WY STD NOTICE TO LESSEE BLM Lease Notice LN for Attachment to Each Lease. Mineral Leasing Act requirements with respect to coal leasing

EOI #WY00020450

WY-2026-06-1906
WYWY106788837
WY, Buffalo Field Office, BLM, PD
T. 46 N., R. 70 W., Sixth Principal
Sec. 17 LOTS 1 thru 4, 6 thru 8;
Sec. 18 LOTS 7, 8.
Campbell County
364.88 Acres
Rental $1,095.00
12.50% Royalty Rate

Stipulations:

WY STD LEASE STIPULATION NO. 3 BLM Stipulation for Multiple Mineral Development
WY BFO_CSU_CLBA2007 BLM Stipulation CSU for Coal Lease By Application Areas
WY BFO_CSU_H20500F1014 BLM Stipulation CSU for Surface Waters and Associated Riparian Habitats - 500 feet of springs, reservoirs, etc.
WY BFO_CSU_R500F4009 BLM Stipulation CSU for Riparian Systems, Wetlands and Aquatic Habitats - 500 feet
WY BFO_CSU_SE1004 BLM Stipulation CSU for Severe Erosion Hazard
WY BFO_CSU_SLR1010 BLM Stipulation CSU for Limited Reclamation Potential Areas
WY BFO_CSU_SSWLA4034 BLM Stipulation CSU for Amphibian Species Breeding, Sheltering, and Hibernation Habitat
WY BFO_CSU_SSWLB4034 BLM Stipulation CSU for Bat Species Breeding, Nursery, Roosting, and Hibernation Habitat
WY BFO_CSU_SSWLH4007 BLM Stipulation CSU for Wildlife Habitat for Special Status Species
HQ-CR-1 BLM Lease Notice LN for Cultural Resource Protection
HQ-MLA-1 BLM Lease Notice LN for Notice to Lessee Concerning Mineral Leasing Act Section 2(a)(2)(A)
HQ-TES-1 BLM Lease Notice LN for Threatened and Endangered Species Act
WY STD LEASE NOTICE NO 1 BLM Lease Notice LN for Reasonable Measures to Minimize Adverse Impacts to Resources
WY STD LEASE NOTICE NO. 2 BLM Lease Notice LN for National Historic Trails
WY STD LEASE NOTICE NO. 3 BLM Lease Notice LN for Greater Sage-Grouse Habitat
WY STD NOTICE TO LESSEE BLM Lease Notice LN for Attachment to Each Lease. Mineral Leasing Act requirements with respect to coal leasing
WY SW_TLS_GHMAL BLM Stipulation TL for Greater Sage-Grouse breeding, nesting, etc. Within 2 miles of an occupied lek outside Priority Habitat Management Areas

EOI #WY00019212

WY-2026-06-2295 Split Estate
WYWY106788838
WY, Buffalo Field Office, BLM, PD
T. 41 N., R. 71 W., Sixth Principal
Sec. 10 LOTS 10, 15;
Sec. 11 LOTS 11 thru 14;
Sec. 14 LOTS 9,10,15,16.
Campbell County
408.07 Acres
Rental $1,227.00
12.50% Royalty Rate

Stipulations:

WY STD LEASE STIPULATION NO. 3 BLM Stipulation for Multiple Mineral Development
WY BFO_CSU_CLBA2007 BLM Stipulation CSU for Coal Lease By Application Areas
WY BFO_CSU_H20500F1014 BLM Stipulation CSU for Surface Waters and Associated Riparian Habitats - 500 feet of springs, reservoirs, etc.
WY BFO_CSU_R500F4009 BLM Stipulation CSU for Riparian Systems, Wetlands and Aquatic Habitats - 500 feet
WY BFO_CSU_RN4028 BLM Stipulation CSU for Raptor Nests (Non-Special Status Species)
WY BFO_CSU_SE1004 BLM Stipulation CSU for Severe Erosion Hazard
WY BFO_CSU_SLOPES25to501006 BLM Stipulation CSU for Slopes Greater than 25% and Less than 50%
WY BFO_CSU_SSWLA4034 BLM Stipulation CSU for Amphibian Species Breeding, Sheltering, and Hibernation Habitat
WY BFO_CSU_SSWLB4034 BLM Stipulation CSU for Bat Species Breeding, Nursery, Roosting, and Hibernation Habitat
WY BFO_CSU_SSWLH4007 BLM Stipulation CSU for Wildlife Habitat for Special Status Species
HQ-CR-1 BLM Lease Notice LN for Cultural Resource Protection
HQ-MLA-1 BLM Lease Notice LN for Notice to Lessee Concerning Mineral Leasing Act Section 2(a)(2)(A)
HQ-TES-1 BLM Lease Notice LN for Threatened and Endangered Species Act
WY BFO_LN_UW BLM Lease Notice LN for Unplugged Wellbore(s) and/or other Facilities
WY STD LEASE NOTICE NO 1 BLM Lease Notice LN for Reasonable Measures to Minimize Adverse Impacts to Resources
WY STD LEASE NOTICE NO. 2 BLM Lease Notice LN for National Historic Trails
WY STD LEASE NOTICE NO. 3 BLM Lease Notice LN for Greater Sage-Grouse Habitat
WY STD NOTICE TO LESSEE BLM Lease Notice LN for Attachment to Each Lease. Mineral Leasing Act requirements with respect to coal leasing
WY BFO_NSO_SSRN4032 BLM Stipulation NSO for Raptor Nest (Special Status Species)
WY BFO_TLS_NSSRN4030 BLM Stipulation TL for Raptor Nests (Non-Special Status Species)
WY BFO_TLS_SSRN4031 BLM Stipulation TL for Raptor Nests (Special Status Species)

EOI #WY00020549, WY00020548, WY00020547

WY-2026-06-7474 Split Estate
WYWY106788839
WY, Buffalo Field Office, BLM, PD
T. 41 N., R. 71 W., Sixth Principal
Sec. 22 LOTS 10;
Sec. 33 LOTS 1 thru 3, 9 thru 12.
Converse,Campbell County
328.85 Acres
Rental $987.00
12.50% Royalty Rate

Stipulations:

WY STD LEASE STIPULATION NO. 3 BLM Stipulation for Multiple Mineral Development
WY BFO_CSU_CLBA2007 BLM Stipulation CSU for Coal Lease By Application Areas
WY BFO_CSU_SSWLA4034 BLM Stipulation CSU for Amphibian Species Breeding, Sheltering, and Hibernation Habitat
WY BFO_CSU_SSWLH4007 BLM Stipulation CSU for Wildlife Habitat for Special Status Species
HQ-CR-1 BLM Lease Notice LN for Cultural Resource Protection
HQ-MLA-1 BLM Lease Notice LN for Notice to Lessee Concerning Mineral Leasing Act Section 2(a)(2)(A)
HQ-TES-1 BLM Lease Notice LN for Threatened and Endangered Species Act
WY STD LEASE NOTICE NO 1 BLM Lease Notice LN for Reasonable Measures to Minimize Adverse Impacts to Resources
WY STD LEASE NOTICE NO. 2 BLM Lease Notice LN for National Historic Trails
WY STD LEASE NOTICE NO. 3 BLM Lease Notice LN for Greater Sage-Grouse Habitat
WY STD NOTICE TO LESSEE BLM Lease Notice LN for Attachment to Each Lease. Mineral Leasing Act requirements with respect to coal leasing
WY CFO_TLS_NR BLM Stipulation TL for Nesting Raptors

EOI #WY00020560, WY00020559

WY-2026-06-7487 Split Estate
WYWY106788840
WY, Buffalo Field Office, BLM, ACQ
T. 42 N., R. 71 W., Sixth Principal
Sec. 9 LOTS 7 thru 10.
Campbell County
164.02 Acres
Rental $495.00
12.50% Royalty Rate

Stipulations:

WY STD LEASE STIPULATION NO. 3 BLM Stipulation for Multiple Mineral Development
WY BFO_CSU_R500F4009 BLM Stipulation CSU for Riparian Systems, Wetlands and Aquatic Habitats - 500 feet
WY BFO_CSU_SSWLA4034 BLM Stipulation CSU for Amphibian Species Breeding, Sheltering, and Hibernation Habitat
WY BFO_CSU_SSWLH4007 BLM Stipulation CSU for Wildlife Habitat for Special Status Species
HQ-CR-1 BLM Lease Notice LN for Cultural Resource Protection
HQ-MLA-1 BLM Lease Notice LN for Notice to Lessee Concerning Mineral Leasing Act Section 2(a)(2)(A)
HQ-TES-1 BLM Lease Notice LN for Threatened and Endangered Species Act
WY BFO_LN_UW BLM Lease Notice LN for Unplugged Wellbore(s) and/or other Facilities
WY STD LEASE NOTICE NO 1 BLM Lease Notice LN for Reasonable Measures to Minimize Adverse Impacts to Resources
WY STD LEASE NOTICE NO. 2 BLM Lease Notice LN for National Historic Trails
WY STD LEASE NOTICE NO. 3 BLM Lease Notice LN for Greater Sage-Grouse Habitat
WY STD NOTICE TO LESSEE BLM Lease Notice LN for Attachment to Each Lease. Mineral Leasing Act requirements with respect to coal leasing
WY BFO_NSO_SSRN4032 BLM Stipulation NSO for Raptor Nest (Special Status Species)
WY BFO_TLS_SSRN4031 BLM Stipulation TL for Raptor Nests (Special Status Species)

EOI #WY00020563

WY-2026-06-2327 Split Estate
WYWY106788841
WY, Buffalo Field Office, BLM, PD
T. 43 N., R. 71 W., Sixth Principal
Sec. 10 LOTS 12, 13.
Campbell County
82.42 Acres
Rental $249.00
12.50% Royalty Rate

Stipulations:

WY STD LEASE STIPULATION NO. 3 BLM Stipulation for Multiple Mineral Development
WY BFO_CSU_CLBA2007 BLM Stipulation CSU for Coal Lease By Application Areas
WY BFO_CSU_SSWLA4034 BLM Stipulation CSU for Amphibian Species Breeding, Sheltering, and Hibernation Habitat
WY BFO_CSU_SSWLH4007 BLM Stipulation CSU for Wildlife Habitat for Special Status Species
HQ-CR-1 BLM Lease Notice LN for Cultural Resource Protection
HQ-MLA-1 BLM Lease Notice LN for Notice to Lessee Concerning Mineral Leasing Act Section 2(a)(2)(A)
HQ-TES-1 BLM Lease Notice LN for Threatened and Endangered Species Act
WY BFO_LN_UW BLM Lease Notice LN for Unplugged Wellbore(s) and/or other Facilities
WY STD LEASE NOTICE NO 1 BLM Lease Notice LN for Reasonable Measures to Minimize Adverse Impacts to Resources
WY STD LEASE NOTICE NO. 2 BLM Lease Notice LN for National Historic Trails
WY STD LEASE NOTICE NO. 3 BLM Lease Notice LN for Greater Sage-Grouse Habitat
WY STD NOTICE TO LESSEE BLM Lease Notice LN for Attachment to Each Lease. Mineral Leasing Act requirements with respect to coal leasing
WY BFO_NSO_SSRN4032 BLM Stipulation NSO for Raptor Nest (Special Status Species)
WY BFO_TLS_SSRN4031 BLM Stipulation TL for Raptor Nests (Special Status Species)

EOI #WY00020567

WY-2026-06-1907
WYWY106788842
WY, Buffalo Field Office, BLM, PD
T. 47 N., R. 71 W., Sixth Principal
Sec. 13 LOTS 5, 12 thru 14;
Sec. 23 LOTS 10, 13.
Campbell County
241.2 Acres
Rental $726.00
12.50% Royalty Rate

Stipulations:

WY STD LEASE STIPULATION NO. 3 BLM Stipulation for Multiple Mineral Development
WY BFO_CSU_CLBA2007 BLM Stipulation CSU for Coal Lease By Application Areas
WY BFO_CSU_SE1004 BLM Stipulation CSU for Severe Erosion Hazard
WY BFO_CSU_SLR1010 BLM Stipulation CSU for Limited Reclamation Potential Areas
WY BFO_CSU_SSWLA4034 BLM Stipulation CSU for Amphibian Species Breeding, Sheltering, and Hibernation Habitat
WY BFO_CSU_SSWLH4007 BLM Stipulation CSU for Wildlife Habitat for Special Status Species
HQ-CR-1 BLM Lease Notice LN for Cultural Resource Protection
HQ-MLA-1 BLM Lease Notice LN for Notice to Lessee Concerning Mineral Leasing Act Section 2(a)(2)(A)
HQ-TES-1 BLM Lease Notice LN for Threatened and Endangered Species Act
WY STD LEASE NOTICE NO 1 BLM Lease Notice LN for Reasonable Measures to Minimize Adverse Impacts to Resources
WY STD LEASE NOTICE NO. 2 BLM Lease Notice LN for National Historic Trails
WY STD LEASE NOTICE NO. 3 BLM Lease Notice LN for Greater Sage-Grouse Habitat
WY STD NOTICE TO LESSEE BLM Lease Notice LN for Attachment to Each Lease. Mineral Leasing Act requirements with respect to coal leasing

EOI #WY00019212

WY-2026-06-7273 Split Estate
WYWY106788843
WY, Casper Field Office, BLM, PD
T. 39 N., R. 72 W., Sixth Principal
Sec. 17 NE1/4SE1/4, W1/2SW1/4;
Sec. 19 LOTS 1 thru 3;
Sec. 19 NE1/4, E1/2NW1/4,NE1/4SW1/4, N1/2SE1/4;
Sec. 20 NE1/4NW1/4, SW1/4NW1/4.
Converse County
710.14 Acres
Rental $2,133.00
12.50% Royalty Rate

Stipulations:

WY STD LEASE STIPULATION NO. 3 BLM Stipulation for Multiple Mineral Development
HQ-CR-1 BLM Lease Notice LN for Cultural Resource Protection
HQ-MLA-1 BLM Lease Notice LN for Notice to Lessee Concerning Mineral Leasing Act Section 2(a)(2)(A)
HQ-TES-1 BLM Lease Notice LN for Threatened and Endangered Species Act
WY STD LEASE NOTICE NO 1 BLM Lease Notice LN for Reasonable Measures to Minimize Adverse Impacts to Resources
WY STD LEASE NOTICE NO. 2 BLM Lease Notice LN for National Historic Trails
WY STD LEASE NOTICE NO. 3 BLM Lease Notice LN for Greater Sage-Grouse Habitat
WY STD NOTICE TO LESSEE BLM Lease Notice LN for Attachment to Each Lease. Mineral Leasing Act requirements with respect to coal leasing
WY CFO_TLS_NR BLM Stipulation TL for Nesting Raptors

EOI #WY00018426

WY-2026-06-2326 Split Estate
WYWY106788844
WY, Buffalo Field Office, BLM, PD
T. 42 N., R. 72 W., Sixth Principal
Sec. 3 LOTS 5, 6.
Campbell County
82.08 Acres
Rental $249.00
12.50% Royalty Rate

Stipulations:

WY STD LEASE STIPULATION NO. 3 BLM Stipulation for Multiple Mineral Development
WY BFO_CSU_RN4028 BLM Stipulation CSU for Raptor Nests (Non-Special Status Species)
WY BFO_CSU_SE1004 BLM Stipulation CSU for Severe Erosion Hazard
WY BFO_CSU_SSWLA4034 BLM Stipulation CSU for Amphibian Species Breeding, Sheltering, and Hibernation Habitat
WY BFO_CSU_SSWLH4007 BLM Stipulation CSU for Wildlife Habitat for Special Status Species
HQ-CR-1 BLM Lease Notice LN for Cultural Resource Protection
HQ-MLA-1 BLM Lease Notice LN for Notice to Lessee Concerning Mineral Leasing Act Section 2(a)(2)(A)
HQ-TES-1 BLM Lease Notice LN for Threatened and Endangered Species Act
WY BFO_LN_UW BLM Lease Notice LN for Unplugged Wellbore(s) and/or other Facilities
WY STD LEASE NOTICE NO 1 BLM Lease Notice LN for Reasonable Measures to Minimize Adverse Impacts to Resources
WY STD LEASE NOTICE NO. 2 BLM Lease Notice LN for National Historic Trails
WY STD LEASE NOTICE NO. 3 BLM Lease Notice LN for Greater Sage-Grouse Habitat
WY STD NOTICE TO LESSEE BLM Lease Notice LN for Attachment to Each Lease. Mineral Leasing Act requirements with respect to coal leasing
WY BFO_NSO_SSRN4032 BLM Stipulation NSO for Raptor Nest (Special Status Species)
WY BFO_TLS_NSSRN4030 BLM Stipulation TL for Raptor Nests (Non-Special Status Species)
WY BFO_TLS_SSRN4031 BLM Stipulation TL for Raptor Nests (Special Status Species)

EOI #WY00020566

WY-2026-06-7349
WYWY106788845
WY, Casper Field Office, BLM, PD
T. 39 N., R. 73 W., Sixth Principal
Sec. 9 NE1/4SW1/4, S1/2SW1/4;
Sec. 10 E1/2SW1/4.
Converse County
200 Acres
Rental $600.00
12.50% Royalty Rate

Stipulations:

WY STD LEASE STIPULATION NO. 3 BLM Stipulation for Multiple Mineral Development
HQ-CR-1 BLM Lease Notice LN for Cultural Resource Protection
HQ-MLA-1 BLM Lease Notice LN for Notice to Lessee Concerning Mineral Leasing Act Section 2(a)(2)(A)
HQ-TES-1 BLM Lease Notice LN for Threatened and Endangered Species Act
WY STD LEASE NOTICE NO 1 BLM Lease Notice LN for Reasonable Measures to Minimize Adverse Impacts to Resources
WY STD LEASE NOTICE NO. 2 BLM Lease Notice LN for National Historic Trails
WY STD LEASE NOTICE NO. 3 BLM Lease Notice LN for Greater Sage-Grouse Habitat
WY STD NOTICE TO LESSEE BLM Lease Notice LN for Attachment to Each Lease. Mineral Leasing Act requirements with respect to coal leasing
CFO-TLS Nesting Raptor BLM Stipulation TL for Nesting Raptor
WY CFO_TLS_NR BLM Stipulation TL for Nesting Raptors

EOI #WY00016204

WY-2026-06-2331 Split Estate
WYWY106788846
WY, Casper Field Office, BLM, PD
T. 36 N., R. 74 W., Sixth Principal
Sec. 28 LOTS 1 thru 15;
Sec. 28 SE1/4SE1/4;
Sec. 29 LOTS 1 thru 16;
Sec. 30 LOTS 5 thru 20.
Converse County
1911.08 Acres
Rental $5,736.00
12.50% Royalty Rate

Stipulations:

WY STD LEASE STIPULATION NO. 3 BLM Stipulation for Multiple Mineral Development
WY CFO_CSU_BT3 BLM Stipulation CSU for Bozeman Trail Cultural and Scenic Values
WY CFO_CSU_BTQTRM BLM Stipulation CSU for Bozeman Trail Cultural and Scenic Values
HQ-CR-1 BLM Lease Notice LN for Cultural Resource Protection
HQ-MLA-1 BLM Lease Notice LN for Notice to Lessee Concerning Mineral Leasing Act Section 2(a)(2)(A)
HQ-TES-1 BLM Lease Notice LN for Threatened and Endangered Species Act
WY STD LEASE NOTICE NO 1 BLM Lease Notice LN for Reasonable Measures to Minimize Adverse Impacts to Resources
WY STD LEASE NOTICE NO. 2 BLM Lease Notice LN for National Historic Trails
WY STD LEASE NOTICE NO. 3 BLM Lease Notice LN for Greater Sage-Grouse Habitat
WY STD NOTICE TO LESSEE BLM Lease Notice LN for Attachment to Each Lease. Mineral Leasing Act requirements with respect to coal leasing
WY CFO_TLS_NR BLM Stipulation TL for Nesting Raptors

EOI #WY00020620

WY-2026-06-2285
WYWY106788847
WY, Casper Field Office, BLM, PD
T. 38 N., R. 74 W., Sixth Principal
Sec. 22 LOTS 5.
Converse County
40.05 Acres
Rental $123.00
12.50% Royalty Rate

Agreements:

WYWY106729641 This parcel is within Communitization Agreement (CA) WYWY106729641, Niobrara Formation, effective October 1, 2022. The operator of this CA is WCR Energy, LLC. These lands are committed to the CA, and a joinder is not required. The successful bidder should contact the CA operator to determine their rights under this CA. The CA operator may require the successful bidder to pay a proportionate cost of the well, or may be treating the parcel as a non-consent owner.

Stipulations:

WY STD LEASE STIPULATION NO. 3 BLM Stipulation for Multiple Mineral Development
WY CFO_CSU_BT3 BLM Stipulation CSU for Bozeman Trail Cultural and Scenic Values
WY CFO_CSU_BTQTRM BLM Stipulation CSU for Bozeman Trail Cultural and Scenic Values
HQ-CR-1 BLM Lease Notice LN for Cultural Resource Protection
HQ-MLA-1 BLM Lease Notice LN for Notice to Lessee Concerning Mineral Leasing Act Section 2(a)(2)(A)
HQ-TES-1 BLM Lease Notice LN for Threatened and Endangered Species Act
WY STD LEASE NOTICE NO 1 BLM Lease Notice LN for Reasonable Measures to Minimize Adverse Impacts to Resources
WY STD LEASE NOTICE NO. 2 BLM Lease Notice LN for National Historic Trails
WY STD LEASE NOTICE NO. 3 BLM Lease Notice LN for Greater Sage-Grouse Habitat
WY STD NOTICE TO LESSEE BLM Lease Notice LN for Attachment to Each Lease. Mineral Leasing Act requirements with respect to coal leasing
WY CFO_TLS_NR BLM Stipulation TL for Nesting Raptors

EOI #WY00020529

WY-2026-06-2289
WYWY106788848
WY, Casper Field Office, BLM, PD
T. 40 N., R. 74 W., Sixth Principal
Sec. 11 NW1/4SW1/4, S1/2SW1/4, S1/2SE1/4;
Sec. 12 W1/2NW1/4, W1/2SW1/4, SE1/4SW1/4.
Converse County
400 Acres
Rental $1,200.00
12.50% Royalty Rate

Stipulations:

WY STD LEASE STIPULATION NO. 3 BLM Stipulation for Multiple Mineral Development
HQ-CR-1 BLM Lease Notice LN for Cultural Resource Protection
HQ-MLA-1 BLM Lease Notice LN for Notice to Lessee Concerning Mineral Leasing Act Section 2(a)(2)(A)
HQ-TES-1 BLM Lease Notice LN for Threatened and Endangered Species Act
WY STD LEASE NOTICE NO 1 BLM Lease Notice LN for Reasonable Measures to Minimize Adverse Impacts to Resources
WY STD LEASE NOTICE NO. 2 BLM Lease Notice LN for National Historic Trails
WY STD LEASE NOTICE NO. 3 BLM Lease Notice LN for Greater Sage-Grouse Habitat
WY STD NOTICE TO LESSEE BLM Lease Notice LN for Attachment to Each Lease. Mineral Leasing Act requirements with respect to coal leasing
WY CFO_TLS_NR BLM Stipulation TL for Nesting Raptors

EOI #WY00020533

WY-2026-06-2264 Split Estate
WYWY106788849
WY, Buffalo Field Office, BLM, PD
T. 48 N., R. 74 W., Sixth Principal
Sec. 3 LOTS 15 thru 18;
Sec. 4 LOTS 7 thru 10, 15 thru 18;
Sec. 5 LOTS 5 thru 20.
Campbell County
1068.26 Acres
Rental $3,207.00
12.50% Royalty Rate

Stipulations:

WY STD LEASE STIPULATION NO. 3 BLM Stipulation for Multiple Mineral Development
WY BFO_CSU_H20500F1014 BLM Stipulation CSU for Surface Waters and Associated Riparian Habitats - 500 feet of springs, reservoirs, etc.
WY BFO_CSU_SE1004 BLM Stipulation CSU for Severe Erosion Hazard
WY BFO_CSU_SLOPES25to501006 BLM Stipulation CSU for Slopes Greater than 25% and Less than 50%
WY BFO_CSU_SLR1010 BLM Stipulation CSU for Limited Reclamation Potential Areas
WY BFO_CSU_SSWLA4034 BLM Stipulation CSU for Amphibian Species Breeding, Sheltering, and Hibernation Habitat
WY BFO_CSU_SSWLH4007 BLM Stipulation CSU for Wildlife Habitat for Special Status Species
HQ-CR-1 BLM Lease Notice LN for Cultural Resource Protection
HQ-MLA-1 BLM Lease Notice LN for Notice to Lessee Concerning Mineral Leasing Act Section 2(a)(2)(A)
HQ-TES-1 BLM Lease Notice LN for Threatened and Endangered Species Act
WY STD LEASE NOTICE NO 1 BLM Lease Notice LN for Reasonable Measures to Minimize Adverse Impacts to Resources
WY STD LEASE NOTICE NO. 2 BLM Lease Notice LN for National Historic Trails
WY STD LEASE NOTICE NO. 3 BLM Lease Notice LN for Greater Sage-Grouse Habitat
WY STD NOTICE TO LESSEE BLM Lease Notice LN for Attachment to Each Lease. Mineral Leasing Act requirements with respect to coal leasing
WY BFO_NSO_SSRN4032 BLM Stipulation NSO for Raptor Nest (Special Status Species)
WY BFO_TLS_SSRN4031 BLM Stipulation TL for Raptor Nests (Special Status Species)
WY BFO_TLS_STG4026 BLM Stipulation TL for Sharp-Tailed Grouse Nesting Habitat
WY SW_TLS_GHMAL BLM Stipulation TL for Greater Sage-Grouse breeding, nesting, etc. Within 2 miles of an occupied lek outside Priority Habitat Management Areas

EOI #WY00020431

WY-2026-06-2263 Split Estate
WYWY106788850
WY, Buffalo Field Office, BLM, PD
T. 48 N., R. 74 W., Sixth Principal
Sec. 20 LOTS 1 thru 16;
Sec. 21 LOTS 1 thru 8;
Sec. 28 LOTS 3 thru 6, 11, 12;
Sec. 29 LOTS 3 thru 6.
Campbell County
1337.73 Acres
Rental $4,014.00
12.50% Royalty Rate

Stipulations:

WY STD LEASE STIPULATION NO. 3 BLM Stipulation for Multiple Mineral Development
WY BFO_CSU_H20500F1014 BLM Stipulation CSU for Surface Waters and Associated Riparian Habitats - 500 feet of springs, reservoirs, etc.
WY BFO_CSU_R500F4009 BLM Stipulation CSU for Riparian Systems, Wetlands and Aquatic Habitats - 500 feet
WY BFO_CSU_RN4028 BLM Stipulation CSU for Raptor Nests (Non-Special Status Species)
WY BFO_CSU_SE1004 BLM Stipulation CSU for Severe Erosion Hazard
WY BFO_CSU_SLOPES25to501006 BLM Stipulation CSU for Slopes Greater than 25% and Less than 50%
WY BFO_CSU_SSWLA4034 BLM Stipulation CSU for Amphibian Species Breeding, Sheltering, and Hibernation Habitat
WY BFO_CSU_SSWLH4007 BLM Stipulation CSU for Wildlife Habitat for Special Status Species
HQ-CR-1 BLM Lease Notice LN for Cultural Resource Protection
HQ-MLA-1 BLM Lease Notice LN for Notice to Lessee Concerning Mineral Leasing Act Section 2(a)(2)(A)
HQ-TES-1 BLM Lease Notice LN for Threatened and Endangered Species Act
WY BFO_LN_UW BLM Lease Notice LN for Unplugged Wellbore(s) and/or other Facilities
WY STD LEASE NOTICE NO 1 BLM Lease Notice LN for Reasonable Measures to Minimize Adverse Impacts to Resources
WY STD LEASE NOTICE NO. 2 BLM Lease Notice LN for National Historic Trails
WY STD LEASE NOTICE NO. 3 BLM Lease Notice LN for Greater Sage-Grouse Habitat
WY STD NOTICE TO LESSEE BLM Lease Notice LN for Attachment to Each Lease. Mineral Leasing Act requirements with respect to coal leasing
WY BFO_NSO_SSRN4032 BLM Stipulation NSO for Raptor Nest (Special Status Species)
WY SW_NSO_GHMAL BLM Stipulation NSO for Greater Sage-Grouse Leks. Within 0.25-mile radius of occupied leks outside Priority Habitat Management Areas
WY BFO_TLS_NSSRN4030 BLM Stipulation TL for Raptor Nests (Non-Special Status Species)
WY BFO_TLS_SSRN4031 BLM Stipulation TL for Raptor Nests (Special Status Species)
WY SW_TLS_GHMAL BLM Stipulation TL for Greater Sage-Grouse breeding, nesting, etc. Within 2 miles of an occupied lek outside Priority Habitat Management Areas

EOI #WY00020432

WY-2026-06-2259 Split Estate
WYWY106788851
WY, Buffalo Field Office, BLM, PD
T. 49 N., R. 74 W., Sixth Principal
Sec. 5 LOTS 8, 9;
Sec. 17 LOTS 6, 11, 13, 14;
Sec. 29 LOTS 3 thru 6, 11 thru 14;
Sec. 30 LOTS 8, 9, 16, 17.
Campbell County
721.29 Acres
Rental $2,166.00
12.50% Royalty Rate

Stipulations:

WY STD LEASE STIPULATION NO. 3 BLM Stipulation for Multiple Mineral Development
WY BFO_CSU_H20500F1014 BLM Stipulation CSU for Surface Waters and Associated Riparian Habitats - 500 feet of springs, reservoirs, etc.
WY BFO_CSU_RN4028 BLM Stipulation CSU for Raptor Nests (Non-Special Status Species)
WY BFO_CSU_SE1004 BLM Stipulation CSU for Severe Erosion Hazard
WY BFO_CSU_SLOPES25to501006 BLM Stipulation CSU for Slopes Greater than 25% and Less than 50%
WY BFO_CSU_SSWLA4034 BLM Stipulation CSU for Amphibian Species Breeding, Sheltering, and Hibernation Habitat
WY BFO_CSU_SSWLH4007 BLM Stipulation CSU for Wildlife Habitat for Special Status Species
WY BFO_CSU_STG4026 BLM Stipulation CSU for Sharp-Tailed Grouse Breeding Habitat
HQ-CR-1 BLM Lease Notice LN for Cultural Resource Protection
HQ-MLA-1 BLM Lease Notice LN for Notice to Lessee Concerning Mineral Leasing Act Section 2(a)(2)(A)
HQ-TES-1 BLM Lease Notice LN for Threatened and Endangered Species Act
WY STD LEASE NOTICE NO 1 BLM Lease Notice LN for Reasonable Measures to Minimize Adverse Impacts to Resources
WY STD LEASE NOTICE NO. 2 BLM Lease Notice LN for National Historic Trails
WY STD LEASE NOTICE NO. 3 BLM Lease Notice LN for Greater Sage-Grouse Habitat
WY STD NOTICE TO LESSEE BLM Lease Notice LN for Attachment to Each Lease. Mineral Leasing Act requirements with respect to coal leasing
WY BFO_NSO_Slopes501006 BLM Stipulation NSO for Slopes Greater than 50%
WY BFO_NSO_SSRN4032 BLM Stipulation NSO for Raptor Nest (Special Status Species)
WY SW_NSO_GHMAL BLM Stipulation NSO for Greater Sage-Grouse Leks. Within 0.25-mile radius of occupied leks outside Priority Habitat Management Areas
WY BFO_TLS_NSSRN4030 BLM Stipulation TL for Raptor Nests (Non-Special Status Species)
WY BFO_TLS_SSRN4031 BLM Stipulation TL for Raptor Nests (Special Status Species)
WY BFO_TLS_STG4026 BLM Stipulation TL for Sharp-Tailed Grouse Nesting Habitat
WY SW_TLS_GHMAL BLM Stipulation TL for Greater Sage-Grouse breeding, nesting, etc. Within 2 miles of an occupied lek outside Priority Habitat Management Areas

EOI #WY00020424, WY00020428, WY00020430, WY00020427

WY-2026-06-2257 Split Estate
WYWY106788852
WY, Casper Field Office, BLM, PD
T. 41 N., R. 75 W., Sixth Principal
Sec. 31 LOTS 1 thru 4;
Sec. 31 NE1/4, E1/2NW1/4, E1/2SW1/4, W1/2SE1/4.
Converse County
561.28 Acres
Rental $1,686.00
12.50% Royalty Rate

Stipulations:

WY STD LEASE STIPULATION NO. 3 BLM Stipulation for Multiple Mineral Development
WY CFO_CSU_BT3 BLM Stipulation CSU for Bozeman Trail Cultural and Scenic Values
WY CFO_CSU_BTQTRM BLM Stipulation CSU for Bozeman Trail Cultural and Scenic Values
HQ-CR-1 BLM Lease Notice LN for Cultural Resource Protection
HQ-MLA-1 BLM Lease Notice LN for Notice to Lessee Concerning Mineral Leasing Act Section 2(a)(2)(A)
HQ-TES-1 BLM Lease Notice LN for Threatened and Endangered Species Act
WY STD LEASE NOTICE NO 1 BLM Lease Notice LN for Reasonable Measures to Minimize Adverse Impacts to Resources
WY STD LEASE NOTICE NO. 2 BLM Lease Notice LN for National Historic Trails
WY STD LEASE NOTICE NO. 3 BLM Lease Notice LN for Greater Sage-Grouse Habitat
WY STD NOTICE TO LESSEE BLM Lease Notice LN for Attachment to Each Lease. Mineral Leasing Act requirements with respect to coal leasing
WY CFO_TLS_NR BLM Stipulation TL for Nesting Raptors

EOI #WY00020410

WY-2026-06-2255 Split Estate
WYWY106788853
WY, Buffalo Field Office, BLM, PD
T. 49 N., R. 75 W., Sixth Principal
Sec. 30 LOTS 3,4.
Campbell County
80.64 Acres
Rental $243.00
12.50% Royalty Rate

Agreements:

WYWY105473060 This parcel is within approved Unit Agreement (UA) WYWY105473060, effective January 15, 2016. Before issuance of a lease for lands within an approved unit, the successful bidder may be required to join the unit (43 CFR 3101.3-1). Any lands included in this Notice that are determined to be in a unit prior to lease issuance are subject to regulation (43 CFR 3101.3-1).

Stipulations:

WY STD LEASE STIPULATION NO. 3 BLM Stipulation for Multiple Mineral Development
WY BFO_CSU_RN4028 BLM Stipulation CSU for Raptor Nests (Non-Special Status Species)
WY BFO_CSU_SE1004 BLM Stipulation CSU for Severe Erosion Hazard
WY BFO_CSU_SLOPES25to501006 BLM Stipulation CSU for Slopes Greater than 25% and Less than 50%
WY BFO_CSU_SSWLA4034 BLM Stipulation CSU for Amphibian Species Breeding, Sheltering, and Hibernation Habitat
WY BFO_CSU_SSWLH4007 BLM Stipulation CSU for Wildlife Habitat for Special Status Species
HQ-CR-1 BLM Lease Notice LN for Cultural Resource Protection
HQ-MLA-1 BLM Lease Notice LN for Notice to Lessee Concerning Mineral Leasing Act Section 2(a)(2)(A)
HQ-TES-1 BLM Lease Notice LN for Threatened and Endangered Species Act
WY BFO_LN_UW BLM Lease Notice LN for Unplugged Wellbore(s) and/or other Facilities
WY STD LEASE NOTICE NO 1 BLM Lease Notice LN for Reasonable Measures to Minimize Adverse Impacts to Resources
WY STD LEASE NOTICE NO. 2 BLM Lease Notice LN for National Historic Trails
WY STD LEASE NOTICE NO. 3 BLM Lease Notice LN for Greater Sage-Grouse Habitat
WY STD NOTICE TO LESSEE BLM Lease Notice LN for Attachment to Each Lease. Mineral Leasing Act requirements with respect to coal leasing
WY BFO_TLS_NSSRN4030 BLM Stipulation TL for Raptor Nests (Non-Special Status Species)

EOI #WY00018567

WY-2026-06-2318
WYWY106788854
WY, Buffalo Field Office, BLM, PD
T. 54 N., R. 77 W., Sixth Principal
Sec. 25 NW1/4NE1/4, S1/2NE1/4, SE1/4.
Sheridan County
280 Acres
Rental $840.00
12.50% Royalty Rate

Stipulations:

WY STD LEASE STIPULATION NO. 3 BLM Stipulation for Multiple Mineral Development
WY BFO_CSU_BEGE4028 BLM Stipulation CSU for Bald and Golden Eagle Winter Roosting Habitat
WY BFO_CSU_H20500F1014 BLM Stipulation CSU for Surface Waters and Associated Riparian Habitats - 500 feet of springs, reservoirs, etc.
WY BFO_CSU_R500F4009 BLM Stipulation CSU for Riparian Systems, Wetlands and Aquatic Habitats - 500 feet
WY BFO_CSU_SE1004 BLM Stipulation CSU for Severe Erosion Hazard
WY BFO_CSU_SLOPES25to501006 BLM Stipulation CSU for Slopes Greater than 25% and Less than 50%
WY BFO_CSU_SLR1010 BLM Stipulation CSU for Limited Reclamation Potential Areas
WY BFO_CSU_SSWLA4034 BLM Stipulation CSU for Amphibian Species Breeding, Sheltering, and Hibernation Habitat
WY BFO_CSU_SSWLB4034 BLM Stipulation CSU for Bat Species Breeding, Nursery, Roosting, and Hibernation Habitat
WY BFO_CSU_SSWLH4007 BLM Stipulation CSU for Wildlife Habitat for Special Status Species
HQ-CR-1 BLM Lease Notice LN for Cultural Resource Protection
HQ-MLA-1 BLM Lease Notice LN for Notice to Lessee Concerning Mineral Leasing Act Section 2(a)(2)(A)
HQ-TES-1 BLM Lease Notice LN for Threatened and Endangered Species Act
WY STD LEASE NOTICE NO 1 BLM Lease Notice LN for Reasonable Measures to Minimize Adverse Impacts to Resources
WY STD LEASE NOTICE NO. 2 BLM Lease Notice LN for National Historic Trails
WY STD LEASE NOTICE NO. 3 BLM Lease Notice LN for Greater Sage-Grouse Habitat
WY STD NOTICE TO LESSEE BLM Lease Notice LN for Attachment to Each Lease. Mineral Leasing Act requirements with respect to coal leasing
WY BFO_NSO_BEGE4028 BLM Stipulation NSO for Bald or Golden Eagle Winter Roosts
WY BFO_TLS_EWR4028 BLM Stipulation TL for Eagle Winter Roosts

EOI #WY00020607

WY-2026-06-7473
WYWY106788855
WY, Rawlins Field Office, BLM, PD
T. 20 N., R. 82 W., Sixth Principal
Sec. 2 LOTS 1 thru 4;
Sec. 2 S1/2.
Carbon County
511.84 Acres
Rental $1,536.00
12.50% Royalty Rate

Stipulations:

WY STD LEASE STIPULATION NO. 3 BLM Stipulation for Multiple Mineral Development
WY RFO_CSU_HTRAILS BLM Stipulation CSU for Historic Trails
HQ-CR-1 BLM Lease Notice LN for Cultural Resource Protection
HQ-MLA-1 BLM Lease Notice LN for Notice to Lessee Concerning Mineral Leasing Act Section 2(a)(2)(A)
HQ-TES-1 BLM Lease Notice LN for Threatened and Endangered Species Act
WY STD LEASE NOTICE NO 1 BLM Lease Notice LN for Reasonable Measures to Minimize Adverse Impacts to Resources
WY STD LEASE NOTICE NO. 2 BLM Lease Notice LN for National Historic Trails
WY STD LEASE NOTICE NO. 3 BLM Lease Notice LN for Greater Sage-Grouse Habitat
WY STD NOTICE TO LESSEE BLM Lease Notice LN for Attachment to Each Lease. Mineral Leasing Act requirements with respect to coal leasing
WY RFO_TLS_BGCW BLM Stipulation TL for Big Game Crucial Winter Range

EOI #WY00020552

WY-2026-06-2293
WYWY106788856
WY, Rawlins Field Office, BLM, PD
T. 20 N., R. 82 W., Sixth Principal
Sec. 10 ALL;
Sec. 18 LOTS 1 thru 4;
Sec. 18 E1/2NW1/4, E1/2SW1/4, E1/2.
Carbon County
1293.1 Acres
Rental $3,882.00
12.50% Royalty Rate

Stipulations:

WY STD LEASE STIPULATION NO. 3 BLM Stipulation for Multiple Mineral Development
WY RFO_CSU_AR BLM Stipulation CSU for Amphibians and Reptiles
WY RFO_CSU_HTRAILS BLM Stipulation CSU for Historic Trails
HQ-CR-1 BLM Lease Notice LN for Cultural Resource Protection
HQ-MLA-1 BLM Lease Notice LN for Notice to Lessee Concerning Mineral Leasing Act Section 2(a)(2)(A)
HQ-TES-1 BLM Lease Notice LN for Threatened and Endangered Species Act
WY RFO_LN_BGCWC BLM Lease Notice LN for Big Game Crucial Winter Range and/or Identified Migration Corridors
WY STD LEASE NOTICE NO 1 BLM Lease Notice LN for Reasonable Measures to Minimize Adverse Impacts to Resources
WY STD LEASE NOTICE NO. 2 BLM Lease Notice LN for National Historic Trails
WY STD LEASE NOTICE NO. 3 BLM Lease Notice LN for Greater Sage-Grouse Habitat
WY STD NOTICE TO LESSEE BLM Lease Notice LN for Attachment to Each Lease. Mineral Leasing Act requirements with respect to coal leasing
WY RFO_TLS_BGCW BLM Stipulation TL for Big Game Crucial Winter Range

EOI #WY00020532

WY-2026-06-2309
WYWY106788857
WY, Rawlins Field Office, BLM, PD
T. 20 N., R. 82 W., Sixth Principal
Sec. 14 ALL;
Sec. 20 SE1/4NE1/4, W1/2NW1/4, S1/2.
Carbon County
1080 Acres
Rental $3,240.00
12.50% Royalty Rate

Stipulations:

WY STD LEASE STIPULATION NO. 3 BLM Stipulation for Multiple Mineral Development
WY RFO_CSU_AR BLM Stipulation CSU for Amphibians and Reptiles
WY RFO_CSU_HTRAILS BLM Stipulation CSU for Historic Trails
HQ-CR-1 BLM Lease Notice LN for Cultural Resource Protection
HQ-MLA-1 BLM Lease Notice LN for Notice to Lessee Concerning Mineral Leasing Act Section 2(a)(2)(A)
HQ-TES-1 BLM Lease Notice LN for Threatened and Endangered Species Act
WY RFO_LN_BGCWC BLM Lease Notice LN for Big Game Crucial Winter Range and/or Identified Migration Corridors
WY STD LEASE NOTICE NO 1 BLM Lease Notice LN for Reasonable Measures to Minimize Adverse Impacts to Resources
WY STD LEASE NOTICE NO. 2 BLM Lease Notice LN for National Historic Trails
WY STD LEASE NOTICE NO. 3 BLM Lease Notice LN for Greater Sage-Grouse Habitat
WY STD NOTICE TO LESSEE BLM Lease Notice LN for Attachment to Each Lease. Mineral Leasing Act requirements with respect to coal leasing
WY RFO_NSO_HTRAILS BLM Stipulation NSO for Historic Trails w/in 1/4 mile of contributing segments
WY RFO_TLS_BGCW BLM Stipulation TL for Big Game Crucial Winter Range

EOI #WY00020553

WY-2026-06-7486
WYWY106788858
WY, Rawlins Field Office, BLM, PD
T. 20 N., R. 83 W., Sixth Principal
Sec. 4 S1/2NE1/4, S1/2NW1/4, S1/2.
Carbon County
480 Acres
Rental $1,440.00
12.50% Royalty Rate

Stipulations:

WY STD LEASE STIPULATION NO. 3 BLM Stipulation for Multiple Mineral Development
WY RFO_CSU_AR BLM Stipulation CSU for Amphibians and Reptiles
WY RFO_CSU_RN BLM Stipulation CSU for Raptor Nests
WY SW_CSU_PHMA BLM Stipulation CSU for Greater Sage-Grouse Priority Habitat Management Areas (PHMAs) - Core Only
HQ-CR-1 BLM Lease Notice LN for Cultural Resource Protection
HQ-MLA-1 BLM Lease Notice LN for Notice to Lessee Concerning Mineral Leasing Act Section 2(a)(2)(A)
HQ-TES-1 BLM Lease Notice LN for Threatened and Endangered Species Act
WY STD LEASE NOTICE NO 1 BLM Lease Notice LN for Reasonable Measures to Minimize Adverse Impacts to Resources
WY STD LEASE NOTICE NO. 2 BLM Lease Notice LN for National Historic Trails
WY STD LEASE NOTICE NO. 3 BLM Lease Notice LN for Greater Sage-Grouse Habitat
WY STD NOTICE TO LESSEE BLM Lease Notice LN for Attachment to Each Lease. Mineral Leasing Act requirements with respect to coal leasing
WY RFO_TLS_BGCW BLM Stipulation TL for Big Game Crucial Winter Range
WY RFO_TLS_RN BLM Stipulation TL for Raptor Nests
WY SW_TLS_PHMAL BLM Stipulation TL for Greater Sage-Grouse breeding, nesting, etc. Inside Priority Habitat Management Areas (Core only)

EOI #WY00020668

WY-2026-06-2311
WYWY106788859
WY, Rawlins Field Office, BLM, PD
T. 20 N., R. 83 W., Sixth Principal
Sec. 10 ALL;
Sec. 12 ALL;
Sec. 14 ALL.
Carbon County
1920 Acres
Rental $5,760.00
12.50% Royalty Rate

Stipulations:
WY STD LEASE STIPULATION NO. 3 BLM Stipulation for Multiple Mineral Development
WY RFO_CSU_AR BLM Stipulation CSU for Amphibians and Reptiles
WY RFO_CSU_HTRAILS BLM Stipulation CSU for Historic Trails
WY RFO_CSU_RN BLM Stipulation CSU for Raptor Nests
HQ-CR-1 BLM Lease Notice LN for Cultural Resource Protection
HQ-MLA-1 BLM Lease Notice LN for Notice to Lessee Concerning Mineral Leasing Act Section 2(a)(2)(A)
HQ-TES-1 BLM Lease Notice LN for Threatened and Endangered Species Act
WY STD LEASE NOTICE NO 1 BLM Lease Notice LN for Reasonable Measures to Minimize Adverse Impacts to Resources
WY STD LEASE NOTICE NO. 2 BLM Lease Notice LN for National Historic Trails
WY STD LEASE NOTICE NO. 3 BLM Lease Notice LN for Greater Sage-Grouse Habitat
WY STD NOTICE TO LESSEE BLM Lease Notice LN for Attachment to Each Lease. Mineral Leasing Act requirements with respect to coal leasing
WY RFO_TLS_BGCW BLM Stipulation TL for Big Game Crucial Winter Range
WY RFO_TLS_RN BLM Stipulation TL for Raptor Nests

EOI #WY00020532, WY00020554

WY-2026-06-2452 Split Estate
WYWY106788860
WY, Casper Field Office, BLM, PD
T. 36 N., R. 87 W., Sixth Principal
Sec. 5 LOTS 1, 2;
Sec. 5 S1/2NE1/4, SE1/4;
Sec. 6 LOTS 1 thru 5;
Sec. 6 S1/2NE1/4, SE1/4NW1/4;
Sec. 7 LOTS 1, 4;
Sec. 7 N1/2NE1/4, NE1/4NW1/4, SE1/4SW1/4, S1/2SE1/4;
Sec. 8 E1/2NE1/4;
Sec. 17 S1/2NE1/4, S1/2NW1/4, S1/2;
Sec. 18 LOTS 2 thru 4;
Sec. 18 S1/2NE1/4, SE1/4NW1/4, E1/2SW1/4, SE1/4.
Natrona County
1952 Acres
Rental $5,856.00
12.50% Royalty Rate

Stipulations:
WY STD LEASE STIPULATION NO. 3 BLM Stipulation for Multiple Mineral Development
WY CFO_CSU_BTQTRM BLM Stipulation CSU for Bozeman Trail Cultural and Scenic Values
WY CFO_CSU_HTRAILS BLM Stipulation CSU for Historic Trails
HQ-CR-1 BLM Lease Notice LN for Cultural Resource Protection
HQ-MLA-1 BLM Lease Notice LN for Notice to Lessee Concerning Mineral Leasing Act Section 2(a)(2)(A)
HQ-TES-1 BLM Lease Notice LN for Threatened and Endangered Species Act
WY STD LEASE NOTICE NO 1 BLM Lease Notice LN for Reasonable Measures to Minimize Adverse Impacts to Resources
WY STD LEASE NOTICE NO. 2 BLM Lease Notice LN for National Historic Trails
WY STD LEASE NOTICE NO. 3 BLM Lease Notice LN for Greater Sage-Grouse Habitat
WY STD NOTICE TO LESSEE BLM Lease Notice LN for Attachment to Each Lease. Mineral Leasing Act requirements with respect to coal leasing
WY CFO_TLS_BGCW BLM Stipulation TL for Big Game Crucial Winter Range
WY CFO_TLS_NR BLM Stipulation TL for Nesting Raptors

EOI #WY00020661

WY-2026-06-2333 Split Estate
WYWY106788861
WY, Casper Field Office, BLM, PD
T. 37 N., R. 87 W., Sixth Principal
Sec. 4 LOTS 1 thru 4;
Sec. 4 S1/2NE1/4, S1/2NW1/4, S1/2;
Sec. 5 LOTS 1 thru 4;
Sec. 5 S1/2NE1/4, S1/2NW1/4, S1/2;
Sec. 6 LOTS 1 thru 7;
Sec. 6 S1/2NE1/4, SE1/4NW1/4, E1/2SW1/4, SE1/4;
Sec. 7 LOT 3, 4 (EXCL 6.26 AC IN RR WYC042124);
Sec. 7 SESW, S2SE (EXCL 12.88 AC IN RR WYC042124);
Sec. 7 LOTS 1, 2;
Sec. 7 NE1/4, E1/2NW1/4, NE1/4SW1/4, N1/2SE1/4.
Natrona County
2539.48 Acres
Rental $7,620.00
12.50% Royalty Rate

Stipulations:
WY STD LEASE STIPULATION NO. 3 BLM Stipulation for Multiple Mineral Development
WY CFO_CSU_BTQTRM BLM Stipulation CSU for Bozeman Trail Cultural and Scenic Values
WY CFO_CSU_HTRAILS BLM Stipulation CSU for Historic Trails
HQ-CR-1 BLM Lease Notice LN for Cultural Resource Protection
HQ-MLA-1 BLM Lease Notice LN for Notice to Lessee Concerning Mineral Leasing Act Section 2(a)(2)(A)
HQ-TES-1 BLM Lease Notice LN for Threatened and Endangered Species Act
WY STD LEASE NOTICE NO 1 BLM Lease Notice LN for Reasonable Measures to Minimize Adverse Impacts to Resources
WY STD LEASE NOTICE NO. 2 BLM Lease Notice LN for National Historic Trails
WY STD LEASE NOTICE NO. 3 BLM Lease Notice LN for Greater Sage-Grouse Habitat
WY STD NOTICE TO LESSEE BLM Lease Notice LN for Attachment to Each Lease. Mineral Leasing Act requirements with respect to coal leasing
WY CFO_TLS_BGCW BLM Stipulation TL for Big Game Crucial Winter Range
WY CFO_TLS_NR BLM Stipulation TL for Nesting Raptors
WY SW_TLS_GHMAL BLM Stipulation TL for Greater Sage-Grouse breeding, nesting, etc. Within 2 miles of an occupied lek outside Priority Habitat Management Areas

EOI #WY00020642

WY-2026-06-2337 Split Estate
WYWY106788862
WY, Casper Field Office, BLM, PD
T. 37 N., R. 87 W., Sixth Principal
Sec. 8 ALL;
Sec. 9 ALL;
Sec. 17 NWNE, S2NE, N2NW (EXCL 25.13 AC IN RR WYC042124);
Sec. 17 NE1/4NE1/4, S1/2NW1/4, S1/2.
Natrona County
1894.87 Acres
Rental $5,685.00
12.50% Royalty Rate

Stipulations:

WY STD LEASE STIPULATION NO. 3 BLM Stipulation for Multiple Mineral Development
WY CFO_CSU_BTQTRM BLM Stipulation CSU for Bozeman Trail Cultural and Scenic Values
WY CFO_CSU_HTRAILS BLM Stipulation CSU for Historic Trails
HQ-CR-1 BLM Lease Notice LN for Cultural Resource Protection
HQ-MLA-1 BLM Lease Notice LN for Notice to Lessee Concerning Mineral Leasing Act Section 2(a)(2)(A)
HQ-TES-1 BLM Lease Notice LN for Threatened and Endangered Species Act
WY STD LEASE NOTICE NO 1 BLM Lease Notice LN for Reasonable Measures to Minimize Adverse Impacts to Resources
WY STD LEASE NOTICE NO. 2 BLM Lease Notice LN for National Historic Trails
WY STD LEASE NOTICE NO. 3 BLM Lease Notice LN for Greater Sage-Grouse Habitat
WY STD NOTICE TO LESSEE BLM Lease Notice LN for Attachment to Each Lease. Mineral Leasing Act requirements with respect to coal leasing
WY CFO_TLS_BGCW BLM Stipulation TL for Big Game Crucial Winter Range
WY CFO_TLS_NR BLM Stipulation TL for Nesting Raptors
WY SW_TLS_GHMAL BLM Stipulation TL for Greater Sage-Grouse breeding, nesting, etc. Within 2 miles of an occupied lek outside Priority Habitat Management Areas

EOI #WY00020642

WY-2026-06-2340 Split Estate
WYWY106788863
WY, Casper Field Office, BLM, PD
T. 37 N., R. 87 W., Sixth Principal
Sec. 18 NENE (EXCL 6.17 AC IN RR WYC042124);
Sec. 18 LOTS 1 thru 4;
Sec. 18 NW1/4NE1/4, S1/2NE1/4, E1/2NW1/4, E1/2SW1/4, SE1/4;
Sec. 19 LOTS 1 thru 4;
Sec. 19 E1/2, E1/2NW1/4, E1/2SW1/4;
Sec. 20 ALL.
Natrona County
1915.91 Acres
Rental $5,748.00
12.50% Royalty Rate

Stipulations:

WY STD LEASE STIPULATION NO. 3 BLM Stipulation for Multiple Mineral Development
WY CFO_CSU_BTQTRM BLM Stipulation CSU for Bozeman Trail Cultural and Scenic Values
WY CFO_CSU_HTRAILS BLM Stipulation CSU for Historic Trails
HQ-CR-1 BLM Lease Notice LN for Cultural Resource Protection
HQ-MLA-1 BLM Lease Notice LN for Notice to Lessee Concerning Mineral Leasing Act Section 2(a)(2)(A)
HQ-TES-1 BLM Lease Notice LN for Threatened and Endangered Species Act
WY STD LEASE NOTICE NO 1 BLM Lease Notice LN for Reasonable Measures to Minimize Adverse Impacts to Resources
WY STD LEASE NOTICE NO. 2 BLM Lease Notice LN for National Historic Trails
WY STD LEASE NOTICE NO. 3 BLM Lease Notice LN for Greater Sage-Grouse Habitat
WY CFO_TLS_BGCW BLM Stipulation TL for Big Game Crucial Winter Range
WY CFO_TLS_NR BLM Stipulation TL for Nesting Raptors
WY SW_TLS_GHMAL BLM Stipulation TL for Greater Sage-Grouse breeding, nesting, etc. Within 2 miles of an occupied lek outside Priority Habitat Management Areas

EOI #WY00020642

WY-2026-06-7483 Split Estate
WYWY106788864
WY, Casper Field Office, BLM, PD
T. 37 N., R. 87 W., Sixth Principal
Sec. 21 N1/2, SW1/4, N1/2SE1/4, SW1/4SE1/4;
Sec. 28 W1/2NE1/4, NW1/4;
Sec. 29 ALL;
Sec. 30 LOTS 1 thru 4;
Sec. 30 E1/2NW1/4, E1/2SW1/4, E1/2.
Natrona County
2121.68 Acres
Rental $6,366.00
12.50% Royalty Rate

Stipulations:

WY STD LEASE STIPULATION NO. 3 BLM Stipulation for Multiple Mineral Development
WY CFO_CSU_BTQTRM BLM Stipulation CSU for Bozeman Trail Cultural and Scenic Values
WY CFO_CSU_HTRAILS BLM Stipulation CSU for Historic Trails
HQ-CR-1 BLM Lease Notice LN for Cultural Resource Protection
HQ-MLA-1 BLM Lease Notice LN for Notice to Lessee Concerning Mineral Leasing Act Section 2(a)(2)(A)
HQ-TES-1 BLM Lease Notice LN for Threatened and Endangered Species Act
WY STD LEASE NOTICE NO 1 BLM Lease Notice LN for Reasonable Measures to Minimize Adverse Impacts to Resources
WY STD LEASE NOTICE NO. 2 BLM Lease Notice LN for National Historic Trails
WY STD LEASE NOTICE NO. 3 BLM Lease Notice LN for Greater Sage-Grouse Habitat
WY STD NOTICE TO LESSEE BLM Lease Notice LN for Attachment to Each Lease. Mineral Leasing Act requirements with respect to coal leasing
WY CFO_TLS_NR BLM Stipulation TL for Nesting Raptors
WY SW_TLS_GHMAL BLM Stipulation TL for Greater Sage-Grouse breeding, nesting, etc. Within 2 miles of an occupied lek outside Priority Habitat Management Areas

EOI #WY00020650

WY-2026-06-2359 Split Estate
WYWY106788865
WY, Casper Field Office, BLM, PD
T. 37 N., R. 87 W., Sixth Principal
Sec. 31 LOTS 1, 2;
Sec. 31 NE1/4, E1/2NW1/4;
Sec. 32 ALL;
Sec. 33 ALL;
Sec. 34 ALL.
Natrona County
2240.48 Acres
Rental $6,723.00
12.50% Royalty Rate

Stipulations:

WY STD LEASE STIPULATION NO. 3 BLM Stipulation for Multiple Mineral Development
WY CFO_CSU_BTQTRM BLM Stipulation CSU for Bozeman Trail Cultural and Scenic Values
WY CFO_CSU_HTRAILS BLM Stipulation CSU for Historic Trails
HQ-CR-1 BLM Lease Notice LN for Cultural Resource Protection
HQ-MLA-1 BLM Lease Notice LN for Notice to Lessee Concerning Mineral Leasing Act Section 2(a)(2)(A)
HQ-TES-1 BLM Lease Notice LN for Threatened and Endangered Species Act
WY STD LEASE NOTICE NO 1 BLM Lease Notice LN for Reasonable Measures to Minimize Adverse Impacts to Resources
WY STD LEASE NOTICE NO. 2 BLM Lease Notice LN for National Historic Trails
WY STD LEASE NOTICE NO. 3 BLM Lease Notice LN for Greater Sage-Grouse Habitat
WY STD NOTICE TO LESSEE BLM Lease Notice LN for Attachment to Each Lease. Mineral Leasing Act requirements with respect to coal leasing
WY CFO_TLS_NR BLM Stipulation TL for Nesting Raptors

EOI #WY00020650

WY-2026-06-2336 Split Estate
WYWY106788866
WY, Casper Field Office, BLM, PD
T. 38 N., R. 87 W., Sixth Principal
Sec. 17 LOTS 1 thru 8;
Sec. 17 E1/2;
Sec. 18 LOTS 1 thru 4;
Sec. 18 NW1/4NE1/4, E1/2NW1/4, E1/2SW1/4;
Sec. 19 LOTS 1 thru 4;
Sec. 19 E1/2NW1/4, E1/2SW1/4, S1/2SE1/4;
Sec. 20 LOTS 1 thru 9;
Sec. 20 S1/2NE1/4, SE1/4SW1/4, W1/2SE1/4.
Natrona County
1887.28 Acres
Rental $5,664.00
12.50% Royalty Rate

Stipulations:

WY STD LEASE STIPULATION NO. 3 BLM Stipulation for Multiple Mineral Development
WY CFO_CSU_TCP BLM Stipulation CSU for Cedar Ridge TCP
HQ-CR-1 BLM Lease Notice LN for Cultural Resource Protection
HQ-MLA-1 BLM Lease Notice LN for Notice to Lessee Concerning Mineral Leasing Act Section 2(a)(2)(A)
HQ-TES-1 BLM Lease Notice LN for Threatened and Endangered Species Act
WY STD LEASE NOTICE NO 1 BLM Lease Notice LN for Reasonable Measures to Minimize Adverse Impacts to Resources
WY STD LEASE NOTICE NO. 2 BLM Lease Notice LN for National Historic Trails
WY STD LEASE NOTICE NO. 3 BLM Lease Notice LN for Greater Sage-Grouse Habitat
WY STD NOTICE TO LESSEE BLM Lease Notice LN for Attachment to Each Lease. Mineral Leasing Act requirements with respect to coal leasing
WY CFO_TLS_NR BLM Stipulation TL for Nesting Raptors

EOI #WY00020642

WY-2026-06-7477 Split Estate
WYWY106788867
WY, Casper Field Office, BLM, PD
T. 38 N., R. 87 W., Sixth Principal
Sec. 29 LOTS 1 thru 4;
Sec. 29 E1/2, SW1/4;
Sec. 30 LOTS 1 thru 4;
Sec. 30 E1/2, E1/2NW1/4, E1/2SW1/4;
Sec. 31 LOTS 1 thru 4;
Sec. 31 E1/2, E1/2NW1/4, E1/2SW1/4;
Sec. 32 N1/2NE1/4, SW1/4NE1/4, NW1/4, S1/2.
Natrona County
2500.49 Acres
Rental $7,503.00
12.50% Royalty Rate

Stipulations:

WY STD LEASE STIPULATION NO. 3 BLM Stipulation for Multiple Mineral Development
WY CFO_CSU_TCP BLM Stipulation CSU for Cedar Ridge TCP
HQ-CR-1 BLM Lease Notice LN for Cultural Resource Protection
HQ-MLA-1 BLM Lease Notice LN for Notice to Lessee Concerning Mineral Leasing Act Section 2(a)(2)(A)
HQ-TES-1 BLM Lease Notice LN for Threatened and Endangered Species Act
WY STD LEASE NOTICE NO 1 BLM Lease Notice LN for Reasonable Measures to Minimize Adverse Impacts to Resources
WY STD LEASE NOTICE NO. 2 BLM Lease Notice LN for National Historic Trails
WY STD LEASE NOTICE NO. 3 BLM Lease Notice LN for Greater Sage-Grouse Habitat
WY STD NOTICE TO LESSEE BLM Lease Notice LN for Attachment to Each Lease. Mineral Leasing Act requirements with respect to coal leasing
WY CFO_TLS_NR BLM Stipulation TL for Nesting Raptors

EOI #WY00020642

WY-2026-06-7496 Split Estate
WYWY106788868
WY, Casper Field Office, BLM, PD
T. 36 N., R. 88 W., Sixth Principal
Sec. 10 ALL;
Sec. 11 S1/2NE1/4, S1/2NW1/4, S1/2;
Sec. 12 N1/2NE1/4, NE1/4NW1/4, NE1/4SW1/4, S1/2SW1/4, NW1/4SE1/4.
Natrona County
1400 Acres
Rental $4,200.00
12.50% Royalty Rate

Stipulations:

WY STD LEASE STIPULATION NO. 3 BLM Stipulation for Multiple Mineral Development
WY CFO_CSU_BTQTRM BLM Stipulation CSU for Bozeman Trail Cultural and Scenic Values
WY CFO_CSU_HTRAILS BLM Stipulation CSU for Historic Trails
HQ-CR-1 BLM Lease Notice LN for Cultural Resource Protection
HQ-MLA-1 BLM Lease Notice LN for Notice to Lessee Concerning Mineral Leasing Act Section 2(a)(2)(A)
HQ-TES-1 BLM Lease Notice LN for Threatened and Endangered Species Act
WY STD LEASE NOTICE NO 1 BLM Lease Notice LN for Reasonable Measures to Minimize Adverse Impacts to Resources
WY STD LEASE NOTICE NO. 2 BLM Lease Notice LN for National Historic Trails
WY STD LEASE NOTICE NO. 3 BLM Lease Notice LN for Greater Sage-Grouse Habitat
WY STD NOTICE TO LESSEE BLM Lease Notice LN for Attachment to Each Lease. Mineral Leasing Act requirements with respect to coal leasing
WY CFO_TLS_BGCW BLM Stipulation TL for Big Game Crucial Winter Range
WY CFO_TLS_NR BLM Stipulation TL for Nesting Raptors

EOI #WY00020662

WY-2026-06-2419 Split Estate
WYWY106788869
WY, Casper Field Office, BLM, PD
T. 36 N., R. 88 W., Sixth Principal
Sec. 13 S1/2NE1/4, N1/2NW1/4, SE1/4NW1/4, SE1/4SW1/4, SE1/4;
Sec. 14 N1/2NE1/4, W1/2NW1/4, S1/2;
Sec. 15 NW1/4, S1/2.
Natrona County
1360 Acres
Rental $4,080.00
12.50% Royalty Rate

Stipulations:

WY STD LEASE STIPULATION NO. 3 BLM Stipulation for Multiple Mineral Development
WY CFO_CSU_BTQTRM BLM Stipulation CSU for Bozeman Trail Cultural and Scenic Values
WY CFO_CSU_HTRAILS BLM Stipulation CSU for Historic Trails
HQ-CR-1 BLM Lease Notice LN for Cultural Resource Protection
HQ-MLA-1 BLM Lease Notice LN for Notice to Lessee Concerning Mineral Leasing Act Section 2(a)(2)(A)
HQ-TES-1 BLM Lease Notice LN for Threatened and Endangered Species Act
WY STD LEASE NOTICE NO 1 BLM Lease Notice LN for Reasonable Measures to Minimize Adverse Impacts to Resources
WY STD LEASE NOTICE NO. 2 BLM Lease Notice LN for National Historic Trails
WY STD LEASE NOTICE NO. 3 BLM Lease Notice LN for Greater Sage-Grouse Habitat
WY STD NOTICE TO LESSEE BLM Lease Notice LN for Attachment to Each Lease. Mineral Leasing Act requirements with respect to coal leasing
WY CFO_TLS_BGCW BLM Stipulation TL for Big Game Crucial Winter Range
WY CFO_TLS_NR BLM Stipulation TL for Nesting Raptors

EOI #WY00020662

WY-2026-06-2363 Split Estate
WYWY106788870
WY, Casper Field Office, BLM, PD
T. 37 N., R. 88 W., Sixth Principal
Sec. 1 LOTS 1 thru 7;
Sec. 1 SW1/4NE1/4, S1/2NW1/4, SW1/4, W1/2SE1/4;
Sec. 2 LOTS 1, 4;
Sec. 2 S1/2NE1/4, S1/2NW1/4, S1/2;
Sec. 3 LOTS 1 thru 4;
Sec. 3 S1/2NE1/4, S1/2NW1/4, S1/2;
Sec. 4 SESW, S2SE (EXCL 15.44 AC IN RR WYC042124);
Sec. 4 LOTS 1 thru 4;
Sec. 4 S1/2NE1/4, S1/2NW1/4, N1/2SW1/4, N1/2SE1/4.
Natrona County
2387.26 Acres
Rental $7,164.00
12.50% Royalty Rate

Stipulations:

WY STD LEASE STIPULATION NO. 3 BLM Stipulation for Multiple Mineral Development
WY CFO_CSU_BTQTRM BLM Stipulation CSU for Bozeman Trail Cultural and Scenic Values
WY CFO_CSU_HTRAILS BLM Stipulation CSU for Historic Trails
WY CFO_CSU_TCP BLM Stipulation CSU for Cedar Ridge TCP
HQ-CR-1 BLM Lease Notice LN for Cultural Resource Protection
HQ-MLA-1 BLM Lease Notice LN for Notice to Lessee Concerning Mineral Leasing Act Section 2(a)(2)(A)
HQ-TES-1 BLM Lease Notice LN for Threatened and Endangered Species Act
WY STD LEASE NOTICE NO 1 BLM Lease Notice LN for Reasonable Measures to Minimize Adverse Impacts to Resources
WY STD LEASE NOTICE NO. 2 BLM Lease Notice LN for National Historic Trails
WY STD LEASE NOTICE NO. 3 BLM Lease Notice LN for Greater Sage-Grouse Habitat
WY STD NOTICE TO LESSEE BLM Lease Notice LN for Attachment to Each Lease. Mineral Leasing Act requirements with respect to coal leasing
WY CFO_TLS_BGCW BLM Stipulation TL for Big Game Crucial Winter Range
WY CFO_TLS_NR BLM Stipulation TL for Nesting Raptors
WY SW_TLS_GHMAL BLM Stipulation TL for Greater Sage-Grouse breeding, nesting, etc. Within 2 miles of an occupied lek outside Priority Habitat Management Areas

EOI #WY00020650

WY-2026-06-2367 Split Estate
WYWY106788871
WY, Casper Field Office, BLM, PD
T. 37 N., R. 88 W., Sixth Principal
Sec. 5 SW (EXCL 12.04 AC IN RR WYC042124);
Sec. 5 LOTS 1 thru 4;
Sec. 5 S1/2NE1/4, S1/2NW1/4, N1/2SE1/4;
Sec. 6 NESW, N2SE (EXCL 18.15 AC IN RR WYC042124);
Sec. 6 LOTS 1 thru 4;
Sec. 6 S1/2NE1/4, S1/2NW1/4, S1/2SW1/4, SW1/4SE1/4.
Natrona County
1072.29 Acres
Rental $3,219.00
12.50% Royalty Rate

Stipulations:

WY STD LEASE STIPULATION NO. 3 BLM Stipulation for Multiple Mineral Development
WY CFO_CSU_BTQTRM BLM Stipulation CSU for Bozeman Trail Cultural and Scenic Values
WY CFO_CSU_HTRAILS BLM Stipulation CSU for Historic Trails
WY CFO_CSU_TCP BLM Stipulation CSU for Cedar Ridge TCP
HQ-CR-1 BLM Lease Notice LN for Cultural Resource Protection
HQ-MLA-1 BLM Lease Notice LN for Notice to Lessee Concerning Mineral Leasing Act Section 2(a)(2)(A)
HQ-TES-1 BLM Lease Notice LN for Threatened and Endangered Species Act
WY STD LEASE NOTICE NO 1 BLM Lease Notice LN for Reasonable Measures to Minimize Adverse Impacts to Resources
WY STD LEASE NOTICE NO. 2 BLM Lease Notice LN for National Historic Trails
WY STD LEASE NOTICE NO. 3 BLM Lease Notice LN for Greater Sage-Grouse Habitat
WY STD NOTICE TO LESSEE BLM Lease Notice LN for Attachment to Each Lease. Mineral Leasing Act requirements with respect to coal leasing
WY CFO_TLS_BGCW BLM Stipulation TL for Big Game Crucial Winter Range
WY CFO_TLS_NR BLM Stipulation TL for Nesting Raptors
WY SW_TLS_GHMAL BLM Stipulation TL for Greater Sage-Grouse breeding, nesting, etc. Within 2 miles of an occupied lek outside Priority Habitat Management Areas

EOI #WY00020650

WY-2026-06-2349 Split Estate
WYWY106788872
WY, Casper Field Office, BLM, PD
T. 37 N., R. 88 W., Sixth Principal
Sec. 7 NW1/4NE1/4, S1/2NE1/4, NW1/4, S1/2;
Sec. 8 NW1/4NE1/4, S1/2NE1/4, W1/2, N1/2SE1/4, SW1/4SE1/4;
Sec. 9 NENE (EXCL 3.05 AC IN RR WYC 042124);
Sec. 9 NW1/4NE1/4, S1/2NE1/4, NW1/4, N1/2SW1/4, SE1/4SW1/4, SE1/4;
Sec. 10 NWNE, S2NE, N2NW (EXCL 25.10 AC IN RR WYC042124);
Sec. 10 NE1/4NE1/4, S1/2NW1/4, S1/2.
Natrona County
2371.85 Acres
Rental $7,116.00
12.50% Royalty Rate

Stipulations:

WY STD LEASE STIPULATION NO. 3 BLM Stipulation for Multiple Mineral Development
WY CFO_CSU_BTQTRM BLM Stipulation CSU for Bozeman Trail Cultural and Scenic Values
WY CFO_CSU_HTRAILS BLM Stipulation CSU for Historic Trails
HQ-CR-1 BLM Lease Notice LN for Cultural Resource Protection
HQ-MLA-1 BLM Lease Notice LN for Notice to Lessee Concerning Mineral Leasing Act Section 2(a)(2)(A)
HQ-TES-1 BLM Lease Notice LN for Threatened and Endangered Species Act
WY STD LEASE NOTICE NO 1 BLM Lease Notice LN for Reasonable Measures to Minimize Adverse Impacts to Resources
WY STD LEASE NOTICE NO. 2 BLM Lease Notice LN for National Historic Trails
WY STD LEASE NOTICE NO. 3 BLM Lease Notice LN for Greater Sage-Grouse Habitat
WY STD NOTICE TO LESSEE BLM Lease Notice LN for Attachment to Each Lease. Mineral Leasing Act requirements with respect to coal leasing
WY CFO_TLS_BGCW BLM Stipulation TL for Big Game Crucial Winter Range
WY CFO_TLS_NR BLM Stipulation TL for Nesting Raptors
WY SW_TLS_GHMAL BLM Stipulation TL for Greater Sage-Grouse breeding, nesting, etc. Within 2 miles of an occupied lek outside Priority Habitat Management Areas

EOI #WY00020656

WY-2026-06-2353 Split Estate
WYWY106788873
WY, Casper Field Office, BLM, PD
T. 37 N., R. 88 W., Sixth Principal
Sec. 11 SWNE, SWNW (EXCL 8.43 AC IN RR WYC042124);
Sec. 11 N1/2NE1/4, SE1/4NE1/4, N1/2NW1/4, NW1/4SW1/4, S1/2SW1/4, S1/2SE1/4;
Sec. 12 LOT 4 (EXCL 4.68 AC IN RR WYC042124);
Sec. 12 SWSE (EXCL 1.33 AC IN RR WYC042124);
Sec. 12 LOTS 1 thru 3;
Sec. 12 W1/2NE1/4, NW1/4, S1/2SW1/4;
Sec. 13 LOTS 1 thru 4;
Sec. 13 W1/2NE1/4, W1/2, W1/2SE1/4;
Sec. 14 ALL.
Natrona County
2188.96 AcresRental $6,567.00

12.50% Royalty Rate

Stipulations:
WY STD LEASE STIPULATION NO. 3 BLM Stipulation for Multiple Mineral Development
WY CFO_CSU_BTQTRM BLM Stipulation CSU for Bozeman Trail Cultural and Scenic Values
WY CFO_CSU_HTRAILS BLM Stipulation CSU for Historic Trails
HQ-CR-1 BLM Lease Notice LN for Cultural Resource Protection
HQ-MLA-1 BLM Lease Notice LN for Notice to Lessee Concerning Mineral Leasing Act Section 2(a)(2)(A)
HQ-TES-1 BLM Lease Notice LN for Threatened and Endangered Species Act
WY STD LEASE NOTICE NO 1 BLM Lease Notice LN for Reasonable Measures to Minimize Adverse Impacts to Resources
WY STD LEASE NOTICE NO. 2 BLM Lease Notice LN for National Historic Trails
WY STD LEASE NOTICE NO. 3 BLM Lease Notice LN for Greater Sage-Grouse Habitat
WY STD NOTICE TO LESSEE BLM Lease Notice LN for Attachment to Each Lease. Mineral Leasing Act requirements with respect to coal leasing
WY CFO_TLS_BGCW BLM Stipulation TL for Big Game Crucial Winter Range
WY CFO_TLS_NR BLM Stipulation TL for Nesting Raptors

EOI #WY00020656

WY-2026-06-2357 Split Estate
WYWY106788874
WY, Casper Field Office, BLM, PD
T. 37 N., R. 88 W., Sixth Principal
Sec. 15 ALL;
Sec. 17 ALL;
Sec. 18 E1/2, NW1/4;
Sec. 20 ALL.
Natrona County
2400 Acres
Rental $7,200.00
12.50% Royalty Rate

Stipulations:

WY STD LEASE STIPULATION NO. 3 BLM Stipulation for Multiple Mineral Development
WY CFO_CSU_BTQTRM BLM Stipulation CSU for Bozeman Trail Cultural and Scenic Values
WY CFO_CSU_HTRAILS BLM Stipulation CSU for Historic Trails
HQ-CR-1 BLM Lease Notice LN for Cultural Resource Protection
HQ-MLA-1 BLM Lease Notice LN for Notice to Lessee Concerning Mineral Leasing Act Section 2(a)(2)(A)
HQ-TES-1 BLM Lease Notice LN for Threatened and Endangered Species Act
WY STD LEASE NOTICE NO 1 BLM Lease Notice LN for Reasonable Measures to Minimize Adverse Impacts to Resources
WY STD LEASE NOTICE NO. 2 BLM Lease Notice LN for National Historic Trails
WY STD LEASE NOTICE NO. 3 BLM Lease Notice LN for Greater Sage-Grouse Habitat
WY STD NOTICE TO LESSEE BLM Lease Notice LN for Attachment to Each Lease. Mineral Leasing Act requirements with respect to coal leasing
WY SW_NSO_GHMAL BLM Stipulation NSO for Greater Sage-Grouse Leks. Within 0.25-mile radius of occupied leks outside Priority Habitat Management Areas
WY CFO_TLS_NR BLM Stipulation TL for Nesting Raptors
WY SW_TLS_GHMAL BLM Stipulation TL for Greater Sage-Grouse breeding, nesting, etc. Within 2 miles of an occupied lek outside Priority Habitat Management Areas

EOI #WY00020656

WY-2026-06-2361 Split Estate
WYWY106788875
WY, Casper Field Office, BLM, PD
T. 37 N., R. 88 W., Sixth Principal
Sec. 21 ALL;
Sec. 22 ALL;
Sec. 23 ALL;
Sec. 24 LOTS 1 thru 4;
Sec. 24 W1/2NE1/4, W1/2, W1/2SE1/4.
Natrona County
2529.28 Acres
Rental $7,590.00
12.50% Royalty Rate

Stipulations:

WY STD LEASE STIPULATION NO. 3 BLM Stipulation for Multiple Mineral Development
WY CFO_CSU_BTQTRM BLM Stipulation CSU for Bozeman Trail Cultural and Scenic Values
WY CFO_CSU_HTRAILS BLM Stipulation CSU for Historic Trails
HQ-CR-1 BLM Lease Notice LN for Cultural Resource Protection
HQ-MLA-1 BLM Lease Notice LN for Notice to Lessee Concerning Mineral Leasing Act Section 2(a)(2)(A)
HQ-TES-1 BLM Lease Notice LN for Threatened and Endangered Species Act
WY STD LEASE NOTICE NO 1 BLM Lease Notice LN for Reasonable Measures to Minimize Adverse Impacts to Resources
WY STD LEASE NOTICE NO. 2 BLM Lease Notice LN for National Historic Trails
WY STD LEASE NOTICE NO. 3 BLM Lease Notice LN for Greater Sage-Grouse Habitat
WY STD NOTICE TO LESSEE BLM Lease Notice LN for Attachment to Each Lease. Mineral Leasing Act requirements with respect to coal leasing
WY SW_NSO_GHMAL BLM Stipulation NSO for Greater Sage-Grouse Leks. Within 0.25-mile radius of occupied leks outside Priority Habitat Management Areas
WY CFO_TLS_NR BLM Stipulation TL for Nesting Raptors
WY SW_TLS_GHMAL BLM Stipulation TL for Greater Sage-Grouse breeding, nesting, etc. Within 2 miles of an occupied lek outside Priority Habitat Management Areas

EOI #WY00020656

WY-2026-06-7482 Split Estate
WYWY106788876
WY, Casper Field Office, BLM, PD
T. 37 N., R. 88 W., Sixth Principal
Sec. 25 LOTS 1 thru 4;
Sec. 25 W1/2NE1/4, W1/2, W1/2SE1/4;
Sec. 26 ALL;
Sec. 27 ALL;
Sec. 28 ALL.
Natrona County
2539.2 Acres
Rental $7,620.00
12.50% Royalty Rate

Stipulations:

WY STD LEASE STIPULATION NO. 3 BLM Stipulation for Multiple Mineral Development
WY CFO_CSU_BTQTRM BLM Stipulation CSU for Bozeman Trail Cultural and Scenic Values
WY CFO_CSU_HTRAILS BLM Stipulation CSU for Historic Trails
HQ-CR-1 BLM Lease Notice LN for Cultural Resource Protection
HQ-MLA-1 BLM Lease Notice LN for Notice to Lessee Concerning Mineral Leasing Act Section 2(a)(2)(A)
HQ-TES-1 BLM Lease Notice LN for Threatened and Endangered Species Act
WY STD LEASE NOTICE NO 1 BLM Lease Notice LN for Reasonable Measures to Minimize Adverse Impacts to Resources
WY STD LEASE NOTICE NO. 2 BLM Lease Notice LN for National Historic Trails
WY STD LEASE NOTICE NO. 3 BLM Lease Notice LN for Greater Sage-Grouse Habitat
WY STD NOTICE TO LESSEE BLM Lease Notice LN for Attachment to Each Lease. Mineral Leasing Act requirements with respect to coal leasing
WY CFO_TLS_BGCW BLM Stipulation TL for Big Game Crucial Winter Range
WY CFO_TLS_NR BLM Stipulation TL for Nesting Raptors
WY SW_TLS_GHMAL BLM Stipulation TL for Greater Sage-Grouse breeding, nesting, etc. Within 2 miles of an occupied lek outside Priority Habitat Management Areas

EOI #WY00020656

WY-2026-06-2454 Split Estate
WYWY106788877
WY, Casper Field Office, BLM, PD
T. 37 N., R. 88 W., Sixth Principal
Sec. 29 ALL;
Sec. 30 ALL;
Sec. 31 LOTS 1 thru 4;
Sec. 31 N1/2NE1/4, N1/2NW1/4, N1/2SW1/4, N1/2SE1/4;
Sec. 32 LOTS 1 thru 4;
Sec. 32 N1/2NE1/4, SE1/4NE1/4, NW1/4, N1/2SW1/4.
Natrona County
2288.16 Acres
Rental $6,867.00
12.50% Royalty Rate

Stipulations:

WY STD LEASE STIPULATION NO. 3 BLM Stipulation for Multiple Mineral Development
WY CFO_CSU_BTQTRM BLM Stipulation CSU for Bozeman Trail Cultural and Scenic Values
WY CFO_CSU_HTRAILS BLM Stipulation CSU for Historic Trails
HQ-CR-1 BLM Lease Notice LN for Cultural Resource Protection
HQ-MLA-1 BLM Lease Notice LN for Notice to Lessee Concerning Mineral Leasing Act Section 2(a)(2)(A)
HQ-TES-1 BLM Lease Notice LN for Threatened and Endangered Species Act
WY STD LEASE NOTICE NO 1 BLM Lease Notice LN for Reasonable Measures to Minimize Adverse Impacts to Resources
WY STD LEASE NOTICE NO. 2 BLM Lease Notice LN for National Historic Trails
WY STD LEASE NOTICE NO. 3 BLM Lease Notice LN for Greater Sage-Grouse Habitat
WY STD NOTICE TO LESSEE BLM Lease Notice LN for Attachment to Each Lease. Mineral Leasing Act requirements with respect to coal leasing
WY CFO_TLS_BGCW BLM Stipulation TL for Big Game Crucial Winter Range
WY CFO_TLS_NR BLM Stipulation TL for Nesting Raptors
WY SW_TLS_GHMAL BLM Stipulation TL for Greater Sage-Grouse breeding, nesting, etc. Within 2 miles of an occupied lek outside Priority Habitat Management Areas

EOI #WY00020661

WY-2026-06-2455 Split Estate
WYWY106788878
WY, Casper Field Office, BLM, PD
T. 37 N., R. 88 W., Sixth Principal
Sec. 33 LOTS 2 thru 4;
Sec. 33 N1/2;
Sec. 34 LOTS 1, 3;
Sec. 34 NE1/4, N1/2SW1/4, N1/2SE1/4;
Sec. 35 LOTS 1 thru 4;
Sec. 35 N1/2, N1/2SW1/4, N1/2SE1/4.
Natrona County
1529.7 Acres
Rental $4,590.00
12.50% Royalty Rate

Stipulations:

WY STD LEASE STIPULATION NO. 3 BLM Stipulation for Multiple Mineral Development
WY CFO_CSU_BTQTRM BLM Stipulation CSU for Bozeman Trail Cultural and Scenic Values
WY CFO_CSU_HTRAILS BLM Stipulation CSU for Historic Trails
HQ-CR-1 BLM Lease Notice LN for Cultural Resource Protection
HQ-MLA-1 BLM Lease Notice LN for Notice to Lessee Concerning Mineral Leasing Act Section 2(a)(2)(A)
HQ-TES-1 BLM Lease Notice LN for Threatened and Endangered Species Act
WY STD LEASE NOTICE NO 1 BLM Lease Notice LN for Reasonable Measures to Minimize Adverse Impacts to Resources
WY STD LEASE NOTICE NO. 2 BLM Lease Notice LN for National Historic Trails
WY STD LEASE NOTICE NO. 3 BLM Lease Notice LN for Greater Sage-Grouse Habitat
WY STD NOTICE TO LESSEE BLM Lease Notice LN for Attachment to Each Lease. Mineral Leasing Act requirements with respect to coal leasing
WY CFO_TLS_BGCW BLM Stipulation TL for Big Game Crucial Winter Range
WY CFO_TLS_NR BLM Stipulation TL for Nesting Raptors
WY SW_TLS_GHMAL BLM Stipulation TL for Greater Sage-Grouse breeding, nesting, etc. Within 2 miles of an occupied lek outside Priority Habitat Management Areas

EOI #WY00020661

WY-2026-06-7478
WYWY106788879
WY, Casper Field Office, BLM, PD
T. 38 N., R. 88 W., Sixth Principal
Sec. 8 NE1/4;
Sec. 9 ALL;
Sec. 33 ALL.
Natrona County
1440 Acres
Rental $4,320.00
12.50% Royalty Rate

Stipulations:

WY STD LEASE STIPULATION NO. 3 BLM Stipulation for Multiple Mineral Development
WY CFO_CSU_TCP BLM Stipulation CSU for Cedar Ridge TCP
HQ-CR-1 BLM Lease Notice LN for Cultural Resource Protection
HQ-MLA-1 BLM Lease Notice LN for Notice to Lessee Concerning Mineral Leasing Act Section 2(a)(2)(A)
HQ-TES-1 BLM Lease Notice LN for Threatened and Endangered Species Act
WY STD LEASE NOTICE NO 1 BLM Lease Notice LN for Reasonable Measures to Minimize Adverse Impacts to Resources
WY STD LEASE NOTICE NO. 2 BLM Lease Notice LN for National Historic Trails
WY STD LEASE NOTICE NO. 3 BLM Lease Notice LN for Greater Sage-Grouse Habitat
WY STD NOTICE TO LESSEE BLM Lease Notice LN for Attachment to Each Lease. Mineral Leasing Act requirements with respect to coal leasing
WY CFO_NSO_TCP BLM Stipulation NSO for Cedar Ridge TCP
WY CFO_TLS_BGCW BLM Stipulation TL for Big Game Crucial Winter Range
WY CFO_TLS_NR BLM Stipulation TL for Nesting Raptors
WY SW_TLS_GHMAL BLM Stipulation TL for Greater Sage-Grouse breeding, nesting, etc. Within 2 miles of an occupied lek outside Priority Habitat Management Areas

EOI #WY00020638

WY-2026-06-2342 Split Estate
WYWY106788880
WY, Casper Field Office, BLM, PD
T. 38 N., R. 88 W., Sixth Principal
Sec. 10 ALL;
Sec. 11 ALL;
Sec. 12 LOTS 1 thru 4;
Sec. 12 W1/2NE1/4, W1/2, W1/2SE1/4;
Sec. 13 LOTS 1 thru 4;
Sec. 13 W1/2NE1/4, W1/2, W1/2SE1/4.
Natrona County
2510.68 Acres
Rental $7,533.00
12.50% Royalty Rate

Stipulations:

WY STD LEASE STIPULATION NO. 3 BLM Stipulation for Multiple Mineral Development
WY CFO_CSU_TCP BLM Stipulation CSU for Cedar Ridge TCP
HQ-CR-1 BLM Lease Notice LN for Cultural Resource Protection
HQ-MLA-1 BLM Lease Notice LN for Notice to Lessee Concerning Mineral Leasing Act Section 2(a)(2)(A)
HQ-TES-1 BLM Lease Notice LN for Threatened and Endangered Species Act
WY STD LEASE NOTICE NO 1 BLM Lease Notice LN for Reasonable Measures to Minimize Adverse Impacts to Resources
WY STD LEASE NOTICE NO. 2 BLM Lease Notice LN for National Historic Trails
WY STD LEASE NOTICE NO. 3 BLM Lease Notice LN for Greater Sage-Grouse Habitat
WY STD NOTICE TO LESSEE BLM Lease Notice LN for Attachment to Each Lease. Mineral Leasing Act requirements with respect to coal leasing
WY CFO_NSO_TCP BLM Stipulation NSO for Cedar Ridge TCP
WY CFO_TLS_NR BLM Stipulation TL for Nesting Raptors
WY SW_TLS_GHMAL BLM Stipulation TL for Greater Sage-Grouse breeding, nesting, etc. Within 2 miles of an occupied lek outside Priority Habitat Management Areas

EOI #WY00020638

WY-2026-06-2346 Split Estate
WYWY106788881
WY, Casper Field Office, BLM, PD
T. 38 N., R. 88 W., Sixth Principal
Sec. 14 ALL;
Sec. 17 S1/2SW1/4, S1/2SE1/4;
Sec. 21 ALL;
Sec. 22 ALL.
Natrona County
2080 Acres
Rental $6,240.00
12.50% Royalty Rate

Stipulations:

WY STD LEASE STIPULATION NO. 3 BLM Stipulation for Multiple Mineral Development
WY CFO_CSU_TCP BLM Stipulation CSU for Cedar Ridge TCP
HQ-CR-1 BLM Lease Notice LN for Cultural Resource Protection
HQ-MLA-1 BLM Lease Notice LN for Notice to Lessee Concerning Mineral Leasing Act Section 2(a)(2)(A)
HQ-TES-1 BLM Lease Notice LN for Threatened and Endangered Species Act
WY STD LEASE NOTICE NO 1 BLM Lease Notice LN for Reasonable Measures to Minimize Adverse Impacts to Resources
WY STD LEASE NOTICE NO. 2 BLM Lease Notice LN for National Historic Trails
WY STD LEASE NOTICE NO. 3 BLM Lease Notice LN for Greater Sage-Grouse Habitat
WY STD NOTICE TO LESSEE BLM Lease Notice LN for Attachment to Each Lease. Mineral Leasing Act requirements with respect to coal leasing
WY CFO_NSO_TCP BLM Stipulation NSO for Cedar Ridge TCP
WY CFO_TLS_BGCW BLM Stipulation TL for Big Game Crucial Winter Range
WY CFO_TLS_NR BLM Stipulation TL for Nesting Raptors
WY SW_TLS_GHMAL BLM Stipulation TL for Greater Sage-Grouse breeding, nesting, etc. Within 2 miles of an occupied lek outside Priority Habitat Management Areas

EOI #WY00020638

WY-2026-06-2347 Split Estate
WYWY106788882
WY, Casper Field Office, BLM, PD
T. 38 N., R. 88 W., Sixth Principal
Sec. 15 ALL;
Sec. 23 ALL.
Natrona County
1280 Acres
Rental $3,840.00
12.50% Royalty Rate

Stipulations:

WY STD LEASE STIPULATION NO. 3 BLM Stipulation for Multiple Mineral Development
WY CFO_CSU_TCP BLM Stipulation CSU for Cedar Ridge TCP
HQ-CR-1 BLM Lease Notice LN for Cultural Resource Protection
HQ-MLA-1 BLM Lease Notice LN for Notice to Lessee Concerning Mineral Leasing Act Section 2(a)(2)(A)
HQ-TES-1 BLM Lease Notice LN for Threatened and Endangered Species Act
WY STD LEASE NOTICE NO 1 BLM Lease Notice LN for Reasonable Measures to Minimize Adverse Impacts to Resources
WY STD LEASE NOTICE NO. 2 BLM Lease Notice LN for National Historic Trails
WY STD LEASE NOTICE NO. 3 BLM Lease Notice LN for Greater Sage-Grouse Habitat
WY STD NOTICE TO LESSEE BLM Lease Notice LN for Attachment to Each Lease. Mineral Leasing Act requirements with respect to coal leasing
WY CFO_NSO_TCP BLM Stipulation NSO for Cedar Ridge TCP
WY CFO_TLS_NR BLM Stipulation TL for Nesting Raptors

EOI #WY00020638

WY-2026-06-2352 Split Estate
WYWY10678888
WY, Casper Field Office, BLM, PD
T. 38 N., R. 88 W., Sixth Principal
Sec. 24 LOTS 1 thru 4;
Sec. 24 W1/2NE1/4, NW1/4NW1/4, S1/2NW1/4, SW1/4, W1/2SE1/4;
Sec. 25 LOTS 1 thru 4;
Sec. 25 W1/2NE1/4, W1/2, W1/2SE1/4;
Sec. 26 ALL.
Natrona County
1841.48 Acres
Rental $5,526.00
12.50% Royalty Rate

Stipulations:

WY STD LEASE STIPULATION NO. 3 BLM Stipulation for Multiple Mineral Development
WY CFO_CSU_TCP BLM Stipulation CSU for Cedar Ridge TCP
HQ-CR-1 BLM Lease Notice LN for Cultural Resource Protection
HQ-MLA-1 BLM Lease Notice LN for Notice to Lessee Concerning Mineral Leasing Act Section 2(a)(2)(A)
HQ-TES-1 BLM Lease Notice LN for Threatened and Endangered Species Act
WY STD LEASE NOTICE NO 1 BLM Lease Notice LN for Reasonable Measures to Minimize Adverse Impacts to Resources
WY STD LEASE NOTICE NO. 2 BLM Lease Notice LN for National Historic Trails
WY STD LEASE NOTICE NO. 3 BLM Lease Notice LN for Greater Sage-Grouse Habitat
WY STD NOTICE TO LESSEE BLM Lease Notice LN for Attachment to Each Lease. Mineral Leasing Act requirements with respect to coal leasing
WY CFO_TLS_NR BLM Stipulation TL for Nesting Raptors

EOI #WY00020638

WY-2026-06-2355 Split Estate
WYWY106788884
WY, Casper Field Office, BLM, PD
T. 38 N., R. 88 W., Sixth Principal
Sec. 27 ALL;
Sec. 28 NE1/4, NW1/4NW1/4, S1/2NW1/4, SW1/4, N1/2SE1/4;
Sec. 31 LOTS 1 thru 4;
Sec. 31 E1/2NW1/4, E1/2SW1/4, E1/2;
Sec. 32 ALL.
Natrona County
2400.4 Acres
Rental $7,203.00
12.50% Royalty Rate

Stipulations:

WY STD LEASE STIPULATION NO. 3 BLM Stipulation for Multiple Mineral Development
WY CFO_CSU_BTQTRM BLM Stipulation CSU for Bozeman Trail Cultural and Scenic Values
WY CFO_CSU_HTRAILS BLM Stipulation CSU for Historic Trails
WY CFO_CSU_TCP BLM Stipulation CSU for Cedar Ridge TCP
HQ-CR-1 BLM Lease Notice LN for Cultural Resource Protection
HQ-MLA-1 BLM Lease Notice LN for Notice to Lessee Concerning Mineral Leasing Act Section 2(a)(2)(A)
HQ-TES-1 BLM Lease Notice LN for Threatened and Endangered Species Act
WY STD LEASE NOTICE NO 1 BLM Lease Notice LN for Reasonable Measures to Minimize Adverse Impacts to Resources
WY STD LEASE NOTICE NO. 2 BLM Lease Notice LN for National Historic Trails
WY STD LEASE NOTICE NO. 3 BLM Lease Notice LN for Greater Sage-Grouse Habitat
WY STD NOTICE TO LESSEE BLM Lease Notice LN for Attachment to Each Lease. Mineral Leasing Act requirements with respect to coal leasing
WY SW_NSO_GHMAL BLM Stipulation NSO for Greater Sage-Grouse Leks. Within 0.25-mile radius of occupied leks outside Priority Habitat Management Areas
WY CFO_TLS_BGCW BLM Stipulation TL for Big Game Crucial Winter Range
WY CFO_TLS_NR BLM Stipulation TL for Nesting Raptors
WY SW_TLS_GHMAL BLM Stipulation TL for Greater Sage-Grouse breeding, nesting, etc. Within 2 miles of an occupied lek outside Priority Habitat Management Areas

EOI #WY00020638

WY-2026-06-2338 Split Estate
WYWY106788885
WY, Casper Field Office, BLM, PD
T. 38 N., R. 88 W., Sixth Principal
Sec. 34 ALL;
Sec. 35 ALL.
Natrona County
1280 Acres
Rental $3,840.00
12.50% Royalty Rate

Stipulations:

WY STD LEASE STIPULATION NO. 3 BLM Stipulation for Multiple Mineral Development
WY CFO_CSU_TCP BLM Stipulation CSU for Cedar Ridge TCP
HQ-CR-1 BLM Lease Notice LN for Cultural Resource Protection
HQ-MLA-1 BLM Lease Notice LN for Notice to Lessee Concerning Mineral Leasing Act Section 2(a)(2)(A)
HQ-TES-1 BLM Lease Notice LN for Threatened and Endangered Species Act
WY STD LEASE NOTICE NO 1 BLM Lease Notice LN for Reasonable Measures to Minimize Adverse Impacts to Resources
WY STD LEASE NOTICE NO. 2 BLM Lease Notice LN for National Historic Trails
WY STD LEASE NOTICE NO. 3 BLM Lease Notice LN for Greater Sage-Grouse Habitat
WY STD NOTICE TO LESSEE BLM Lease Notice LN for Attachment to Each Lease. Mineral Leasing Act requirements with respect to coal leasing
WY CFO_TLS_NR BLM Stipulation TL for Nesting Raptors
WY SW_TLS_GHMAL BLM Stipulation TL for Greater Sage-Grouse breeding, nesting, etc. Within 2 miles of an occupied lek outside Priority Habitat Management Areas

EOI #WY00020642

WY-2026-06-2376 Split Estate
WYWY106788886
WY, Rawlins Field Office, BLM, PD
T. 14 N., R. 90 W., Sixth Principal
Sec. 6 LOTS 8 thru 14;
Sec. 6 S1/2NE1/4, SE1/4NW1/4, E1/2SW1/4, SE1/4.
Carbon County
610.67 Acres
Rental $1,833.00
12.50% Royalty Rate

Stipulations:

WY STD LEASE STIPULATION NO. 3 BLM Stipulation for Multiple Mineral Development
WY RFO_CSU_AR BLM Stipulation CSU for Amphibians and Reptiles
WY RFO_CSU_HTRAILS BLM Stipulation CSU for Historic Trails
WY RFO_CSU_RN BLM Stipulation CSU for Raptor Nests
WY SW_CSU_PHMA BLM Stipulation CSU for Greater Sage-Grouse Priority Habitat Management Areas (PHMAs) - Core Only
HQ-CR-1 BLM Lease Notice LN for Cultural Resource Protection
HQ-MLA-1 BLM Lease Notice LN for Notice to Lessee Concerning Mineral Leasing Act Section 2(a)(2)(A)
HQ-TES-1 BLM Lease Notice LN for Threatened and Endangered Species Act
WY STD LEASE NOTICE NO 1 BLM Lease Notice LN for Reasonable Measures to Minimize Adverse Impacts to Resources
WY STD LEASE NOTICE NO. 3 BLM Lease Notice LN for Greater Sage-Grouse Habitat
WY STD NOTICE TO LESSEE BLM Lease Notice LN for Attachment to Each Lease. Mineral Leasing Act requirements with respect to coal leasing
WY SW_NSO_PHMAL BLM Stipulation NSO for Greater Sage-Grouse leks. Within 0.6-mile radius of occupied leks inside Priority Habitat Management Areas
WY RFO_TLS_BGCW BLM Stipulation TL for Big Game Crucial Winter Range
WY RFO_TLS_RN BLM Stipulation TL for Raptor Nests
WY SW_TLS_GHMAL BLM Stipulation TL for Greater Sage-Grouse breeding, nesting, etc. Within 2 miles of an occupied lek outside Priority Habitat Management Areas
WY SW_TLS_PHMAL BLM Stipulation TL for Greater Sage-Grouse breeding, nesting, etc. Inside Priority Habitat Management Areas (Core only)

EOI #WY00020680

WY-2026-06-2379 Split Estate
WYWY106788887
WY, Rawlins Field Office, BLM, PD
T. 14 N., R. 90 W., Sixth Principal
Sec. 7 LOTS 5 thru 8;
Sec. 7 E1/2, E1/2NW1/4, E1/2SW1/4;
Sec. 8 NE1/4, W1/2.
Carbon County
1076.84 Acres
Rental $3,231.00
12.50% Royalty Rate

Stipulations:

WY STD LEASE STIPULATION NO. 3 BLM Stipulation for Multiple Mineral Development
WY RFO_CSU_AR BLM Stipulation CSU for Amphibians and Reptiles
WY RFO_CSU_HTRAILS BLM Stipulation CSU for Historic Trails
WY RFO_CSU_RN BLM Stipulation CSU for Raptor Nests
WY SW_CSU_PHMA BLM Stipulation CSU for Greater Sage-Grouse Priority Habitat Management Areas (PHMAs) - Core Only
HQ-CR-1 BLM Lease Notice LN for Cultural Resource Protection
HQ-MLA-1 BLM Lease Notice LN for Notice to Lessee Concerning Mineral Leasing Act Section 2(a)(2)(A)
HQ-TES-1 BLM Lease Notice LN for Threatened and Endangered Species Act
WY RFO_LN_BGCWC BLM Lease Notice LN for Big Game Crucial Winter Range and/or Identified Migration Corridors
WY STD LEASE NOTICE NO 1 BLM Lease Notice LN for Reasonable Measures to Minimize Adverse Impacts to Resources
WY STD LEASE NOTICE NO. 2 BLM Lease Notice LN for National Historic Trails
WY STD LEASE NOTICE NO. 3 BLM Lease Notice LN for Greater Sage-Grouse Habitat
WY STD NOTICE TO LESSEE BLM Lease Notice LN for Attachment to Each Lease. Mineral Leasing Act requirements with respect to coal leasing
WY RFO_NSO_HTRAILS BLM Stipulation NSO for Historic Trails w/in 1/4 mile of contributing segments
WY SW_NSO_PHMAL BLM Stipulation NSO for Greater Sage-Grouse leks. Within 0.6-mile radius of occupied leks inside Priority Habitat Management Areas
WY RFO_TLS_BGCW BLM Stipulation TL for Big Game Crucial Winter Range
WY RFO_TLS_RN BLM Stipulation TL for Raptor Nests
WY SW_TLS_PHMAL BLM Stipulation TL for Greater Sage-Grouse breeding, nesting, etc. Inside Priority Habitat Management Areas (Core only)

EOI #WY00020684, WY00020686

WY-2026-06-7475 Split Estate
WYWY106788888
WY, Rawlins Field Office, BLM, PD
T. 14 N., R. 90 W., Sixth Principal
Sec. 17 ALL;
Sec. 20 ALL;
Sec. 28 ALL;
Sec. 29 ALL.
Carbon County
2560 Acres
Rental $7,680.00
12.50% Royalty Rate

Stipulations:

WY STD LEASE STIPULATION NO. 3 BLM Stipulation for Multiple Mineral Development
WY RFO_CSU_AR BLM Stipulation CSU for Amphibians and Reptiles
WY RFO_CSU_HTRAILS BLM Stipulation CSU for Historic Trails
WY RFO_CSU_RN BLM Stipulation CSU for Raptor Nests
WY SW_CSU_PHMA BLM Stipulation CSU for Greater Sage-Grouse Priority Habitat Management Areas (PHMAs) - Core Only
HQ-CR-1 BLM Lease Notice LN for Cultural Resource Protection
HQ-MLA-1 BLM Lease Notice LN for Notice to Lessee Concerning Mineral Leasing Act Section 2(a)(2)(A)
HQ-TES-1 BLM Lease Notice LN for Threatened and Endangered Species Act
WY RFO_LN_BGCWC BLM Lease Notice LN for Big Game Crucial Winter Range and/or Identified Migration Corridors
WY STD LEASE NOTICE NO 1 BLM Lease Notice LN for Reasonable Measures to Minimize Adverse Impacts to Resources
WY STD LEASE NOTICE NO. 2 BLM Lease Notice LN for National Historic Trails
WY STD LEASE NOTICE NO. 3 BLM Lease Notice LN for Greater Sage-Grouse Habitat
WY STD NOTICE TO LESSEE BLM Lease Notice LN for Attachment to Each Lease. Mineral Leasing Act requirements with respect to coal leasing
WY SW_NSO_PHMAL BLM Stipulation NSO for Greater Sage-Grouse leks. Within 0.6-mile radius of occupied leks inside Priority Habitat Management Areas
WY RFO_TLS_BGCW BLM Stipulation TL for Big Game Crucial Winter Range
WY RFO_TLS_BON BLM Stipulation TL for Burrowing Owl Nests
WY RFO_TLS_RN BLM Stipulation TL for Raptor Nests
WY SW_TLS_PHMAL BLM Stipulation TL for Greater Sage-Grouse breeding, nesting, etc. Inside Priority Habitat Management Areas (Core only)

EOI #WY00020612, WY00020613, WY00020614, WY00020615

WY-2026-06-2407 Split Estate
WYWY106788889
WY, Rawlins Field Office, BLM, PD
T. 14 N., R. 90 W., Sixth Principal
Sec. 18 LOTS 5 thru 8;
Sec. 18 E1/2, E1/2NW1/4, E1/2SW1/4;
Sec. 19 LOTS 5 thru 8;
Sec. 19 E1/2, E1/2NW1/4, E1/2SW1/4;
Sec. 21 NE1/4NE1/4, S1/2NE1/4, NW1/4, S1/2.
Carbon County
1793.68 Acres
Rental $5,382.00
12.50% Royalty Rate

Stipulations:

WY STD LEASE STIPULATION NO. 3 BLM Stipulation for Multiple Mineral Development
WY RFO_CSU_AR BLM Stipulation CSU for Amphibians and Reptiles
WY RFO_CSU_HTRAILS BLM Stipulation CSU for Historic Trails
WY RFO_CSU_RN BLM Stipulation CSU for Raptor Nests
WY SW_CSU_PHMA BLM Stipulation CSU for Greater Sage-Grouse Priority Habitat Management Areas (PHMAs) - Core Only
HQ-CR-1 BLM Lease Notice LN for Cultural Resource Protection
HQ-MLA-1 BLM Lease Notice LN for Notice to Lessee Concerning Mineral Leasing Act Section 2(a)(2)(A)
HQ-TES-1 BLM Lease Notice LN for Threatened and Endangered Species Act
WY RFO_LN_BGCWC BLM Lease Notice LN for Big Game Crucial Winter Range and/or Identified Migration Corridors
WY STD LEASE NOTICE NO 1 BLM Lease Notice LN for Reasonable Measures to Minimize Adverse Impacts to Resources

WY STD LEASE NOTICE NO. 2 BLM Lease Notice LN for National Historic Trails
WY STD LEASE NOTICE NO. 3 BLM Lease Notice LN for Greater Sage-Grouse Habitat
WY SW_NSO_PHMAL BLM Stipulation NSO for Greater Sage-Grouse leks. Within 0.6-mile radius of occupied leks inside Priority Habitat Management Areas
WY RFO_TLS_BGCW BLM Stipulation TL for Big Game Crucial Winter Range
WY RFO_TLS_BON BLM Stipulation TL for Burrowing Owl Nests
WY RFO_TLS_RN BLM Stipulation TL for Raptor Nests
WY SW_TLS_PHMAL BLM Stipulation TL for Greater Sage-Grouse breeding, nesting, etc. Inside Priority Habitat Management Areas (Core only)

EOI #WY00020689, WY00020695, WY00020700

WY-2026-06-2354 Split Estate
WYWY106788890
WY, Rawlins Field Office, BLM, PD
T. 15 N., R. 90 W., Sixth Principal
Sec. 30 LOTS 7, 8;
Sec. 30 E1/2SW1/4, SW1/4SE1/4;
Sec. 32 SW1/4.
Carbon County
337.82 Acres
Rental $1,014.00
12.50% Royalty Rate

Stipulations:

WY STD LEASE STIPULATION NO. 3 BLM Stipulation for Multiple Mineral Development
WY RFO_CSU_AR BLM Stipulation CSU for Amphibians and Reptiles
WY RFO_CSU_HTRAILS BLM Stipulation CSU for Historic Trails
WY RFO_CSU_RN BLM Stipulation CSU for Raptor Nests
WY SW_CSU_PHMA BLM Stipulation CSU for Greater Sage-Grouse Priority Habitat Management Areas (PHMAs) - Core Only
HQ-CR-1 BLM Lease Notice LN for Cultural Resource Protection
HQ-MLA-1 BLM Lease Notice LN for Notice to Lessee Concerning Mineral Leasing Act Section 2(a)(2)(A)
HQ-TES-1 BLM Lease Notice LN for Threatened and Endangered Species Act
WY RFO_LN_BGCWC BLM Lease Notice LN for Big Game Crucial Winter Range and/or Identified Migration Corridors
WY STD LEASE NOTICE NO 1 BLM Lease Notice LN for Reasonable Measures to Minimize Adverse Impacts to Resources
WY STD LEASE NOTICE NO. 2 BLM Lease Notice LN for National Historic Trails
WY STD LEASE NOTICE NO. 3 BLM Lease Notice LN for Greater Sage-Grouse Habitat
WY STD NOTICE TO LESSEE BLM Lease Notice LN for Attachment to Each Lease. Mineral Leasing Act requirements with respect to coal leasing
WY RFO_TLS_BGCW BLM Stipulation TL for Big Game Crucial Winter Range
WY SW_TLS_GHMAL BLM Stipulation TL for Greater Sage-Grouse breeding, nesting, etc. Within 2 miles of an occupied lek outside Priority Habitat Management Areas
WY SW_TLS_PHMAL BLM Stipulation TL for Greater Sage-Grouse breeding, nesting, etc. Inside Priority Habitat Management Areas (Core only)

EOI #WY00020663, WY00020664

WY-2026-06-2323 Split Estate
WYWY106788891
WY, Rawlins Field Office, BLM, PD
T. 15 N., R. 90 W., Sixth Principal
Sec. 31 LOTS 5 thru 8;
Sec. 31 E1/2, E1/2NW1/4, E1/2SW1/4.
Carbon County
595.98 Acres
Rental $1,788.00
12.50% Royalty Rate

Stipulations:

WY STD LEASE STIPULATION NO. 3 BLM Stipulation for Multiple Mineral Development
WY RFO_CSU_AR BLM Stipulation CSU for Amphibians and Reptiles
WY RFO_CSU_HTRAILS BLM Stipulation CSU for Historic Trails
WY RFO_CSU_RN BLM Stipulation CSU for Raptor Nests
WY SW_CSU_PHMA BLM Stipulation CSU for Greater Sage-Grouse Priority Habitat Management Areas (PHMAs) - Core Only
HQ-CR-1 BLM Lease Notice LN for Cultural Resource Protection
HQ-MLA-1 BLM Lease Notice LN for Notice to Lessee Concerning Mineral Leasing Act Section 2(a)(2)(A)
HQ-TES-1 BLM Lease Notice LN for Threatened and Endangered Species Act
WY RFO_LN_BGCWC BLM Lease Notice LN for Big Game Crucial Winter Range and/or Identified Migration Corridors
WY STD LEASE NOTICE NO 1 BLM Lease Notice LN for Reasonable Measures to Minimize Adverse Impacts to Resources
WY STD LEASE NOTICE NO. 2 BLM Lease Notice LN for National Historic Trails
WY STD LEASE NOTICE NO. 3 BLM Lease Notice LN for Greater Sage-Grouse Habitat
WY STD NOTICE TO LESSEE BLM Lease Notice LN for Attachment to Each Lease. Mineral Leasing Act requirements with respect to coal leasing
WY RFO_TLS_BGCW BLM Stipulation TL for Big Game Crucial Winter Range
WY RFO_TLS_RN BLM Stipulation TL for Raptor Nests
WY SW_TLS_GHMAL BLM Stipulation TL for Greater Sage-Grouse breeding, nesting, etc. Within 2 miles of an occupied lek outside Priority Habitat Management Areas
WY SW_TLS_PHMAL BLM Stipulation TL for Greater Sage-Grouse breeding, nesting, etc. Inside Priority Habitat Management Areas (Core only)

EOI #WY00020611

WY-2026-06-2364
WYWY106788892
WY, Lander Field Office, BLM, PD
T. 38 N., R. 90 W., Sixth Principal
Sec. 18 SE1/4;
Sec. 19 LOTS 3 thru 9;
Sec. 19 S1/2NE1/4, SE1/4NW1/4, E1/2SW1/4, SE1/4;
Sec. 20 LOT 1 (EXCL 5.34 AC IN RR WYD039337);
Sec. 20 SENE (EXCL 0.03 AC IN RR WYD39337);
Sec. 20 LOTS 2 thru 4;
Sec. 20 SW1/4NE1/4, S1/2NW1/4, S1/2;
Sec. 21 LOT 4 (EXCL 0.64 AC IN WYD039337);
Sec. 21 SWNW (EXCL 6.70 AC IN WYD039337);
Sec. 21 W2SW (EXCL 12.40 AC IN WYD039337);
Sec. 21 LOTS 1 thru 3;
Sec. 21 S1/2NE1/4, SE1/4NW1/4, E1/2SW1/4, SE1/4.
Fremont County
1972.91 Acres
Rental $5,919.00
12.50% Royalty Rate

Stipulations:

WY STD LEASE STIPULATION NO. 3 BLM Stipulation for Multiple Mineral Development
WY LFO_CSU_LRPS1013 BLM Stipulation CSU for Limited Reclamation Potential Soils
WY LFO_CSU_PYFC5058 BLM Stipulation CSU for Fossil Resources
WY LFO_CSU_RHTEH5018 BLM Stipulation CSU for Regional Historic Trails and Early Highways and their Settings
WY LFO_CSU_S15TO24P1014 BLM Stipulation CSU for Slopes between 15 and 24 Percent
HQ-CR-1 BLM Lease Notice LN for Cultural Resource Protection
HQ-MLA-1 BLM Lease Notice LN for Notice to Lessee Concerning Mineral Leasing Act Section 2(a)(2)(A)
HQ-TES-1 BLM Lease Notice LN for Threatened and Endangered Species Act
WY STD LEASE NOTICE NO 1 BLM Lease Notice LN for Reasonable Measures to Minimize Adverse Impacts to Resources
WY STD LEASE NOTICE NO. 2 BLM Lease Notice LN for National Historic Trails
WY STD LEASE NOTICE NO. 3 BLM Lease Notice LN for Greater Sage-Grouse Habitat
WY STD NOTICE TO LESSEE BLM Lease Notice LN for Attachment to Each Lease. Mineral Leasing Act requirements with respect to coal leasing
WY LFO_NSO_PSWDDA4031 BLM Stipulation NSO for Perennial Surface Waters, Riparian-Wetland Areas, and/or Playas Within Designated Development Areas
WY LFO_NSO_SG25P1014 BLM Stipulation NSO for Slopes Greater than 25 Percent
WY LFO_TLS_BGCW4061 BLM Stipulation TL for Big Game Crucial Winter Range
WY LFO_TLS_BGCWP4061 BLM Stipulation TL for Big Game Parturition Areas
WY LFO_TLS_FFS4053 BLM Stipulation TL for Fish Fall Spawning Habitat
WY LFO_TLS_MPN4094 BLM Stipulation TL for Mountain Plover Nesting Habitat
WY LFO_TLS_RN4071 BLM Stipulation TL for Raptor Nests

EOI #WY00020518

WY-2026-06-2366
WYWY106788893
WY, Lander Field Office, BLM, PD
T. 38 N., R. 90 W., Sixth Principal
Sec. 22 LOTS 1 thru 4;
Sec. 22 S1/2NE1/4, S1/2NW1/4, S1/2;
Sec. 27 S2NW (EXCL 9.48 AC IN RR WYD039337);
Sec. 27 NE1/4, N1/2NW1/4;
Sec. 28 S2NE, N2NW, SENW (EXCL 21.43 AC IN RR WYD039337);
Sec. 28 N1/2NE1/4, SW1/4NW1/4;
Sec. 29 SE1/4;
Sec. 30 LOTS 1 thru 4;
Sec. 30 E1/2, E1/2NW1/4, E1/2SW1/4.
Fremont County
2066.76 Acres
Rental $6,201.00
12.50% Royalty Rate
Stipulations:

WY STD LEASE STIPULATION NO. 3 BLM Stipulation for Multiple Mineral Development
WY LFO_CSU_LRPS1013 BLM Stipulation CSU for Limited Reclamation Potential Soils
WY LFO_CSU_PYFC5058 BLM Stipulation CSU for Fossil Resources
WY LFO_CSU_RHTEH5018 BLM Stipulation CSU for Regional Historic Trails and Early Highways and their Settings
WY LFO_CSU_S15TO24P1014 BLM Stipulation CSU for Slopes between 15 and 24 Percent
HQ-CR-1 BLM Lease Notice LN for Cultural Resource Protection
HQ-MLA-1 BLM Lease Notice LN for Notice to Lessee Concerning Mineral Leasing Act Section 2(a)(2)(A)
HQ-TES-1 BLM Lease Notice LN for Threatened and Endangered Species Act
WY STD LEASE NOTICE NO 1 BLM Lease Notice LN for Reasonable Measures to Minimize Adverse Impacts to Resources
WY STD LEASE NOTICE NO. 2 BLM Lease Notice LN for National Historic Trails
WY STD LEASE NOTICE NO. 3 BLM Lease Notice LN for Greater Sage-Grouse Habitat
WY STD NOTICE TO LESSEE BLM Lease Notice LN for Attachment to Each Lease. Mineral Leasing Act requirements with respect to coal leasing
WY LFO_NSO_5050 BLM Stipulation NSO for Sacred, Spiritual, and Traditional Cultural Properties
WY LFO_NSO_PSW4031 BLM Stipulation NSO for Perennial Surface Waters, Riparian-Wetland Areas, and/or Playas Outside of Designated Development Areas
WY LFO_NSO_PSWDDA4031 BLM Stipulation NSO for Perennial Surface Waters, Riparian-Wetland Areas, and/or Playas Within Designated Development Areas
WY LFO_NSO_SG25P1014 BLM Stipulation NSO for Slopes Greater than 25 Percent
WY LFO_TLS_BGCW4061 BLM Stipulation TL for Big Game Crucial Winter Range
WY LFO_TLS_FFS4053 BLM Stipulation TL for Fish Fall Spawning Habitat
WY LFO_TLS_GSGGH4105 BLM Stipulation TL for Greater Sage-Grouse Breeding, Nesting, & Early Brood-Rearing Habitat Outside Designated Core Area
WY LFO_TLS_GSGPH4105 BLM Stipulation TL for Greater Sage-Grouse Breeding, Nesting, & Early Brood-Rearing Habitat Inside Designated Core Area
WY LFO_TLS_MPN4094 BLM Stipulation TL for Mountain Plover Nesting Habitat
WY LFO_TLS_RN4071 BLM Stipulation TL for Raptor Nests
WY SW_TLS_GHMAL BLM Stipulation TL for Greater Sage-Grouse breeding, nesting, etc. Within 2 miles of an occupied lek outside Priority Habitat Management Areas

EOI #WY00020518

WY-2026-06-7488 Split Estate
WYWY106788894
WY, Rawlins Field Office, BLM, PD
T. 14 N., R. 91 W., Sixth Principal
Sec. 1 LOTS 6;
Sec. 1 SW1/4NE1/4, S1/2NW1/4, SW1/4, W1/2SE1/4.
Carbon County
400.44 Acres
Rental $1,203.00
12.50% Royalty Rate

Stipulations:

WY STD LEASE STIPULATION NO. 3 BLM Stipulation for Multiple Mineral Development
WY RFO_CSU_AR BLM Stipulation CSU for Amphibians and Reptiles
WY RFO_CSU_HTRAILS BLM Stipulation CSU for Historic Trails
WY RFO_CSU_RN BLM Stipulation CSU for Raptor Nests
WY SW_CSU_PHMA BLM Stipulation CSU for Greater Sage-Grouse Priority Habitat Management Areas (PHMAs) - Core Only
HQ-CR-1 BLM Lease Notice LN for Cultural Resource Protection
HQ-MLA-1 BLM Lease Notice LN for Notice to Lessee Concerning Mineral Leasing Act Section 2(a)(2)(A)
HQ-TES-1 BLM Lease Notice LN for Threatened and Endangered Species Act
WY RFO_LN_BGCWC BLM Lease Notice LN for Big Game Crucial Winter Range and/or Identified Migration Corridors
WY RFO_LN_UW BLM Lease Notice LN for Unplugged Wellbores
WY STD LEASE NOTICE NO 1 BLM Lease Notice LN for Reasonable Measures to Minimize Adverse Impacts to Resources
WY STD LEASE NOTICE NO. 2 BLM Lease Notice LN for National Historic Trails
WY STD LEASE NOTICE NO. 3 BLM Lease Notice LN for Greater Sage-Grouse Habitat
WY STD NOTICE TO LESSEE BLM Lease Notice LN for Attachment to Each Lease. Mineral Leasing Act requirements with respect to coal leasing
WY RFO_NSO_HTRAILS BLM Stipulation NSO for Historic Trails w/in 1/4 mile of contributing segments
WY SW_NSO_GHMAL BLM Stipulation NSO for Greater Sage-Grouse Leks. Within 0.25-mile radius of occupied leks outside Priority Habitat Management Areas
WY SW_NSO_PHMAL BLM Stipulation NSO for Greater Sage-Grouse leks. Within 0.6-mile radius of occupied leks inside Priority Habitat Management Areas
WY RFO_TLS_BGCW BLM Stipulation TL for Big Game Crucial Winter Range
WY RFO_TLS_RN BLM Stipulation TL for Raptor Nests
WY SW_TLS_GHMAL BLM Stipulation TL for Greater Sage-Grouse breeding, nesting, etc. Within 2 miles of an occupied lek outside Priority Habitat Management Areas
WY SW_TLS_PHMAL BLM Stipulation TL for Greater Sage-Grouse breeding, nesting, etc. Inside Priority Habitat Management Areas (Core only)

EOI #WY00020665

WY-2026-06-2362 Split Estate
WYWY106788895
WY, Rawlins Field Office, BLM, PD
T. 14 N., R. 91 W., Sixth Principal
Sec. 2 LOTS 5 thru 8;
Sec. 2 S1/2NE1/4, SE1/4;
Sec. 24 LOTS 1 thru 4;
Sec. 24 W1/2NE1/4, E1/2NW1/4, E1/2SW1/4, W1/2SE1/4.
Carbon County
874.12 Acres
Rental $2,625.00
12.50% Royalty Rate

Stipulations:

WY STD LEASE STIPULATION NO. 3 BLM Stipulation for Multiple Mineral Development
WY RFO_CSU_AR BLM Stipulation CSU for Amphibians and Reptiles
WY RFO_CSU_HTRAILS BLM Stipulation CSU for Historic Trails
WY RFO_CSU_RN BLM Stipulation CSU for Raptor Nests
WY SW_CSU_PHMA BLM Stipulation CSU for Greater Sage-Grouse Priority Habitat Management Areas (PHMAs) - Core Only
HQ-CR-1 BLM Lease Notice LN for Cultural Resource Protection
HQ-MLA-1 BLM Lease Notice LN for Notice to Lessee Concerning Mineral Leasing Act Section 2(a)(2)(A)
HQ-TES-1 BLM Lease Notice LN for Threatened and Endangered Species Act
WY RFO_LN_BGCWC BLM Lease Notice LN for Big Game Crucial Winter Range and/or Identified Migration Corridors
WY STD LEASE NOTICE NO 1 BLM Lease Notice LN for Reasonable Measures to Minimize Adverse Impacts to Resources
WY STD LEASE NOTICE NO. 2 BLM Lease Notice LN for National Historic Trails
WY STD LEASE NOTICE NO. 3 BLM Lease Notice LN for Greater Sage-Grouse Habitat
WY STD NOTICE TO LESSEE BLM Lease Notice LN for Attachment to Each Lease. Mineral Leasing Act requirements with respect to coal leasing
WY RFO_NSO_HTRAILS BLM Stipulation NSO for Historic Trails w/in 1/4 mile of contributing segments
WY SW_NSO_PHMAL BLM Stipulation NSO for Greater Sage-Grouse leks. Within 0.6-mile radius of occupied leks inside Priority Habitat Management Areas
WY RFO_TLS_BGCW BLM Stipulation TL for Big Game Crucial Winter Range
WY RFO_TLS_RN BLM Stipulation TL for Raptor Nests
WY SW_TLS_GHMAL BLM Stipulation TL for Greater Sage-Grouse breeding, nesting, etc. Within 2 miles of an occupied lek outside Priority Habitat Management Areas
WY SW_TLS_PHMAL BLM Stipulation TL for Greater Sage-Grouse breeding, nesting, etc. Inside Priority Habitat Management Areas (Core only)

EOI #WY00020667, WY00020666

WY-2026-06-7502 Split Estate
WYWY106788896
WY, Rawlins Field Office, BLM, PD
T. 15 N., R. 91 W., Sixth Principal
Sec. 22 E1/2.
Carbon County
320 Acres
Rental $960.00
12.50% Royalty Rate

Stipulations:

WY STD LEASE STIPULATION NO. 3 BLM Stipulation for Multiple Mineral Development
WY RFO_CSU_AR BLM Stipulation CSU for Amphibians and Reptiles
WY RFO_CSU_HTRAILS BLM Stipulation CSU for Historic Trails
WY RFO_CSU_RN BLM Stipulation CSU for Raptor Nests
HQ-CR-1 BLM Lease Notice LN for Cultural Resource Protection
HQ-MLA-1 BLM Lease Notice LN for Notice to Lessee Concerning Mineral Leasing Act Section 2(a)(2)(A)
HQ-TES-1 BLM Lease Notice LN for Threatened and Endangered Species Act
WY RFO_LN_BGCWC BLM Lease Notice LN for Big Game Crucial Winter Range and/or Identified Migration Corridors
WY STD LEASE NOTICE NO 1 BLM Lease Notice LN for Reasonable Measures to Minimize Adverse Impacts to Resources
WY STD LEASE NOTICE NO. 2 BLM Lease Notice LN for National Historic Trails
WY STD LEASE NOTICE NO. 3 BLM Lease Notice LN for Greater Sage-Grouse Habitat
WY STD NOTICE TO LESSEE BLM Lease Notice LN for Attachment to Each Lease. Mineral Leasing Act requirements with respect to coal leasing
WY RFO_TLS_BGCW BLM Stipulation TL for Big Game Crucial Winter Range
WY RFO_TLS_BON BLM Stipulation TL for Burrowing Owl Nests
WY RFO_TLS_MPN BLM Stipulation TL for Mountain Plover Nests
WY RFO_TLS_RN BLM Stipulation TL for Raptor Nests
WY SW_TLS_GHMAL BLM Stipulation TL for Greater Sage-Grouse breeding, nesting, etc. Within 2 miles of an occupied lek outside Priority Habitat Management Areas

EOI #WY00020658

WY-2026-06-2393 Split Estate
WYWY106788897
WY, Rawlins Field Office, BLM, PD
T. 16 N., R. 91 W., Sixth Principal
Sec. 12 NW1/4NE1/4, SE1/4NE1/4, NW1/4SW1/4, E1/2SE1/4.
Carbon County
200 Acres
Rental $600.00
12.50% Royalty Rate

Stipulations:

WY STD LEASE STIPULATION NO. 3 BLM Stipulation for Multiple Mineral Development
WY RFO_CSU_AR BLM Stipulation CSU for Amphibians and Reptiles
WY RFO_CSU_HTRAILS BLM Stipulation CSU for Historic Trails
WY RFO_CSU_JO BLM Stipulation CSU for JO Ranch (historic and visual values within setting)
WY RFO_CSU_RN BLM Stipulation CSU for Raptor Nests
WY SW_CSU_PHMA BLM Stipulation CSU for Greater Sage-Grouse Priority Habitat Management Areas (PHMAs) - Core Only
HQ-CR-1 BLM Lease Notice LN for Cultural Resource Protection
HQ-MLA-1 BLM Lease Notice LN for Notice to Lessee Concerning Mineral Leasing Act Section 2(a)(2)(A)
HQ-TES-1 BLM Lease Notice LN for Threatened and Endangered Species Act
WY RFO_LN_BGCWC BLM Lease Notice LN for Big Game Crucial Winter Range and/or Identified Migration Corridors
WY STD LEASE NOTICE NO 1 BLM Lease Notice LN for Reasonable Measures to Minimize Adverse Impacts to Resources
WY STD LEASE NOTICE NO. 2 BLM Lease Notice LN for National Historic Trails
WY STD LEASE NOTICE NO. 3 BLM Lease Notice LN for Greater Sage-Grouse Habitat
WY STD NOTICE TO LESSEE BLM Lease Notice LN for Attachment to Each Lease. Mineral Leasing Act requirements with respect to coal leasing
WY RFO_NSO_HTRAILS BLM Stipulation NSO for Historic Trails w/in 1/4 mile of contributing segments
WY RFO_TLS_BGCW BLM Stipulation TL for Big Game Crucial Winter Range
WY RFO_TLS_BON BLM Stipulation TL for Burrowing Owl Nests
WY RFO_TLS_RN BLM Stipulation TL for Raptor Nests
WY SW_TLS_PHMAL BLM Stipulation TL for Greater Sage-Grouse breeding, nesting, etc. Inside Priority Habitat Management Areas (Core only)

EOI #WY00020636

WY-2026-06-2332 Split Estate
WYWY106788898
WY, Rawlins Field Office, BLM, PD
T. 16 N., R. 91 W., Sixth Principal
Sec. 13 E1/2, NE1/4NW1/4, E1/2SW1/4, SW1/4SW1/4;
Sec. 24 W1/2.
Carbon County
800 Acres
Rental $2,400.00
12.50% Royalty Rate

Stipulations:

WY STD LEASE STIPULATION NO. 3 BLM Stipulation for Multiple Mineral Development
WY RFO_CSU_AR BLM Stipulation CSU for Amphibians and Reptiles
WY RFO_CSU_HTRAILS BLM Stipulation CSU for Historic Trails
WY RFO_CSU_JO BLM Stipulation CSU for JO Ranch (historic and visual values within setting)
WY RFO_CSU_RN BLM Stipulation CSU for Raptor Nests
WY SW_CSU_PHMA BLM Stipulation CSU for Greater Sage-Grouse Priority Habitat Management Areas (PHMAs) - Core Only
HQ-CR-1 BLM Lease Notice LN for Cultural Resource Protection
HQ-MLA-1 BLM Lease Notice LN for Notice to Lessee Concerning Mineral Leasing Act Section 2(a)(2)(A)
HQ-TES-1 BLM Lease Notice LN for Threatened and Endangered Species Act
WY RFO_LN_BGCWC BLM Lease Notice LN for Big Game Crucial Winter Range and/or Identified Migration Corridors
WY STD LEASE NOTICE NO 1 BLM Lease Notice LN for Reasonable Measures to Minimize Adverse Impacts to Resources
WY STD LEASE NOTICE NO. 2 BLM Lease Notice LN for National Historic Trails
WY STD LEASE NOTICE NO. 3 BLM Lease Notice LN for Greater Sage-Grouse Habitat
WY RFO_NSO_JO BLM Stipulation NSO for JO Ranch
WY SW_NSO_PHMAL BLM Stipulation NSO for Greater Sage-Grouse leks. Within 0.6-mile radius of occupied leks inside Priority Habitat Management Areas
WY RFO_TLS_BGCW BLM Stipulation TL for Big Game Crucial Winter Range
WY RFO_TLS_BON BLM Stipulation TL for Burrowing Owl Nests
WY RFO_TLS_MPN BLM Stipulation TL for Mountain Plover Nests
WY RFO_TLS_RN BLM Stipulation TL for Raptor Nests
WY SW_TLS_PHMAL BLM Stipulation TL for Greater Sage-Grouse breeding, nesting, etc. Inside Priority Habitat Management Areas (Core only)

EOI #WY00020637, WY00020639

WY-2026-06-2375 Split Estate
WYWY106788899
WY, Rawlins Field Office, BLM, PD
T. 16 N., R. 91 W., Sixth Principal
Sec. 34 W1/2NW1/4, S1/2.
Carbon County
400 Acres
Rental $1,200.00
12.50% Royalty Rate
Stipulations:

WY STD LEASE STIPULATION NO. 3 BLM Stipulation for Multiple Mineral Development
WY RFO_CSU_AR BLM Stipulation CSU for Amphibians and Reptiles
WY RFO_CSU_HTRAILS BLM Stipulation CSU for Historic Trails
WY RFO_CSU_RN BLM Stipulation CSU for Raptor Nests
WY SW_CSU_PHMA BLM Stipulation CSU for Greater Sage-Grouse Priority Habitat Management Areas (PHMAs) - Core Only
HQ-CR-1 BLM Lease Notice LN for Cultural Resource Protection
HQ-MLA-1 BLM Lease Notice LN for Notice to Lessee Concerning Mineral Leasing Act Section 2(a)(2)(A)
HQ-TES-1 BLM Lease Notice LN for Threatened and Endangered Species Act
WY STD LEASE NOTICE NO 1 BLM Lease Notice LN for Reasonable Measures to Minimize Adverse Impacts to Resources
WY STD LEASE NOTICE NO. 2 BLM Lease Notice LN for National Historic Trails
WY STD LEASE NOTICE NO. 3 BLM Lease Notice LN for Greater Sage-Grouse Habitat
WY STD NOTICE TO LESSEE BLM Lease Notice LN for Attachment to Each Lease. Mineral Leasing Act requirements with respect to coal leasing
WY RFO_TLS_BON BLM Stipulation TL for Burrowing Owl Nests
WY RFO_TLS_MPN BLM Stipulation TL for Mountain Plover Nests
WY RFO_TLS_RN BLM Stipulation TL for Raptor Nests
WY SW_TLS_GHMAL BLM Stipulation TL for Greater Sage-Grouse breeding, nesting, etc. Within 2 miles of an occupied lek outside Priority Habitat Management Areas
WY SW_TLS_PHMAL BLM Stipulation TL for Greater Sage-Grouse breeding, nesting, etc. Inside Priority Habitat Management Areas (Core only)

EOI #WY00020595

WY-2026-06-7484
WYWY106788900
WY, Lander Field Office, BLM, PD
T. 37 N., R. 91 W., Sixth Principal
Sec. 24 LOTS 1 thru 3;
Sec. 24 W1/2NE1/4, E1/2NW1/4, NE1/4SW1/4, SW1/4SW1/4, NW1/4SE1/4.
Fremont County
415.02 Acres
Rental $1,248.00
12.50% Royalty Rate

Stipulations:

WY STD LEASE STIPULATION NO. 3 BLM Stipulation for Multiple Mineral Development
WY LFO_CSU_LRPS1013 BLM Stipulation CSU for Limited Reclamation Potential Soils
WY LFO_CSU_PYFC5058 BLM Stipulation CSU for Fossil Resources
WY LFO_CSU_RHTEH5018 BLM Stipulation CSU for Regional Historic Trails and Early Highways and their Settings
HQ-CR-1 BLM Lease Notice LN for Cultural Resource Protection
HQ-MLA-1 BLM Lease Notice LN for Notice to Lessee Concerning Mineral Leasing Act Section 2(a)(2)(A)
HQ-TES-1 BLM Lease Notice LN for Threatened and Endangered Species Act
WY STD LEASE NOTICE NO 1 BLM Lease Notice LN for Reasonable Measures to Minimize Adverse Impacts to Resources
WY STD LEASE NOTICE NO. 2 BLM Lease Notice LN for National Historic Trails
WY STD LEASE NOTICE NO. 3 BLM Lease Notice LN for Greater Sage-Grouse Habitat
WY STD NOTICE TO LESSEE BLM Lease Notice LN for Attachment to Each Lease. Mineral Leasing Act requirements with respect to coal leasing
WY LFO_NSO_5050 BLM Stipulation NSO for Sacred, Spiritual, and Traditional Cultural Properties
WY LFO_NSO_PSWDDA4031 BLM Stipulation NSO for Perennial Surface Waters, Riparian-Wetland Areas, and/or Playas Within Designated Development Areas
WY LFO_TLS_BGCW4061 BLM Stipulation TL for Big Game Crucial Winter Range
WY LFO_TLS_MPN4094 BLM Stipulation TL for Mountain Plover Nesting Habitat
WY LFO_TLS_RN4071 BLM Stipulation TL for Raptor Nests

EOI #WY00020518

WY-2026-06-7485
WYWY106788901
WY, Lander Field Office, BLM, PD
T. 38 N., R. 91 W., Sixth Principal
Sec. 23 ALL;
Sec. 26 ALL;
Sec. 27 ALL;
Sec. 28 ALL.
Fremont County
2560 Acres
Rental $7,680.00
12.50% Royalty Rate

Stipulations:

WY STD LEASE STIPULATION NO. 3 BLM Stipulation for Multiple Mineral Development
WY LFO_CSU_LRPS1013 BLM Stipulation CSU for Limited Reclamation Potential Soils
WY LFO_CSU_PYFC5058 BLM Stipulation CSU for Fossil Resources
WY LFO_CSU_S15TO24P1014 BLM Stipulation CSU for Slopes between 15 and 24 Percent
HQ-CR-1 BLM Lease Notice LN for Cultural Resource Protection
HQ-MLA-1 BLM Lease Notice LN for Notice to Lessee Concerning Mineral Leasing Act Section 2(a)(2)(A)
HQ-TES-1 BLM Lease Notice LN for Threatened and Endangered Species Act
WY STD LEASE NOTICE NO 1 BLM Lease Notice LN for Reasonable Measures to Minimize Adverse Impacts to Resources
WY STD LEASE NOTICE NO. 2 BLM Lease Notice LN for National Historic Trails
WY STD LEASE NOTICE NO. 3 BLM Lease Notice LN for Greater Sage-Grouse Habitat
WY STD NOTICE TO LESSEE BLM Lease Notice LN for Attachment to Each Lease. Mineral Leasing Act requirements with respect to coal leasing
WY LFO_NSO_PSW4031 BLM Stipulation NSO for Perennial Surface Waters, Riparian-Wetland Areas, and/or Playas Outside of Designated Development Areas
WY LFO_NSO_SG25P1014 BLM Stipulation NSO for Slopes Greater than 25 Percent
WY LFO_TLS_MPN4094 BLM Stipulation TL for Mountain Plover Nesting Habitat
WY LFO_TLS_RN4071 BLM Stipulation TL for Raptor Nests

EOI #WY00020518

WY-2026-06-2360
WYWY106788902
WY, Lander Field Office, BLM, PD
T. 38 N., R. 91 W., Sixth Principal
Sec. 29 NE1/4NW1/4, S1/2NW1/4, SW1/4;
Sec. 31 LOTS 1 thru 10;
Sec. 31 NE1/4, E1/2NW1/4, NE1/4SW1/4, N1/2SE1/4.
Fremont County
919.37 Acres
Rental $2,760.00
12.50% Royalty Rate

Stipulations:

WY STD LEASE STIPULATION NO. 3 BLM Stipulation for Multiple Mineral Development
WY LFO_CSU_LRPS1013 BLM Stipulation CSU for Limited Reclamation Potential Soils
WY LFO_CSU_PYFC5058 BLM Stipulation CSU for Fossil Resources
WY LFO_CSU_RHTEH5018 BLM Stipulation CSU for Regional Historic Trails and Early Highways and their Settings
WY LFO_CSU_S15TO24P1014 BLM Stipulation CSU for Slopes between 15 and 24 Percent
HQ-CR-1 BLM Lease Notice LN for Cultural Resource Protection
HQ-MLA-1 BLM Lease Notice LN for Notice to Lessee Concerning Mineral Leasing Act Section 2(a)(2)(A)
HQ-TES-1 BLM Lease Notice LN for Threatened and Endangered Species Act
WY STD LEASE NOTICE NO 1 BLM Lease Notice LN for Reasonable Measures to Minimize Adverse Impacts to Resources
WY STD LEASE NOTICE NO. 2 BLM Lease Notice LN for National Historic Trails
WY STD LEASE NOTICE NO. 3 BLM Lease Notice LN for Greater Sage-Grouse Habitat
WY STD NOTICE TO LESSEE BLM Lease Notice LN for Attachment to Each Lease. Mineral Leasing Act requirements with respect to coal leasing
WY LFO_NSO_PSW4031 BLM Stipulation NSO for Perennial Surface Waters, Riparian-Wetland Areas, and/or Playas Outside of Designated Development Areas
WY LFO_NSO_SG25P1014 BLM Stipulation NSO for Slopes Greater than 25 Percent
WY LFO_TLS_GSGGH4105 BLM Stipulation TL for Greater Sage-Grouse Breeding, Nesting, & Early Brood-Rearing Habitat Outside Designated Core Area
WY LFO_TLS_MPN4094 BLM Stipulation TL for Mountain Plover Nesting Habitat
WY LFO_TLS_RN4071 BLM Stipulation TL for Raptor Nests
WY SW_TLS_GHMAL BLM Stipulation TL for Greater Sage-Grouse breeding, nesting, etc. Within 2 miles of an occupied lek outside Priority Habitat Management Areas

EOI #WY00020518

WY-2026-06-2287 Split Estate
WYWY106788903
WY, Lander Field Office, BLM, PD
T. 38 N., R. 91 W., Sixth Principal
Sec. 30 LOTS 1 thru 8;
Sec. 30 E1/2, E1/2NW1/4, E1/2SW1/4.
Fremont County
726.24 Acres
Rental $2,181.00
12.50% Royalty Rate

Stipulations:

WY STD LEASE STIPULATION NO. 3 BLM Stipulation for Multiple Mineral Development
WY LFO_CSU_LRPS1013 BLM Stipulation CSU for Limited Reclamation Potential Soils
WY LFO_CSU_PYFC5058 BLM Stipulation CSU for Fossil Resources
WY LFO_CSU_RHTEH5018 BLM Stipulation CSU for Regional Historic Trails and Early Highways and their Settings
WY LFO_CSU_S15TO24P1014 BLM Stipulation CSU for Slopes between 15 and 24 Percent
HQ-CR-1 BLM Lease Notice LN for Cultural Resource Protection
HQ-MLA-1 BLM Lease Notice LN for Notice to Lessee Concerning Mineral Leasing Act Section 2(a)(2)(A)
HQ-TES-1 BLM Lease Notice LN for Threatened and Endangered Species Act
WY STD LEASE NOTICE NO 1 BLM Lease Notice LN for Reasonable Measures to Minimize Adverse Impacts to Resources
WY STD LEASE NOTICE NO. 2 BLM Lease Notice LN for National Historic Trails
WY STD LEASE NOTICE NO. 3 BLM Lease Notice LN for Greater Sage-Grouse Habitat
WY STD NOTICE TO LESSEE BLM Lease Notice LN for Attachment to Each Lease. Mineral Leasing Act requirements with respect to coal leasing
WY LFO_NSO_SG25P1014 BLM Stipulation NSO for Slopes Greater than 25 Percent
WY LFO_TLS_GSGGH4105 BLM Stipulation TL for Greater Sage-Grouse Breeding, Nesting, & Early Brood-Rearing Habitat Outside Designated Core Area
WY LFO_TLS_MPN4094 BLM Stipulation TL for Mountain Plover Nesting Habitat
WY LFO_TLS_RN4071 BLM Stipulation TL for Raptor Nests
WY SW_TLS_GHMAL BLM Stipulation TL for Greater Sage-Grouse breeding, nesting, etc. Within 2 miles of an occupied lek outside Priority Habitat Management Areas

EOI #WY00020496

WY-2026-06-7479 Split Estate
WYWY106788904
WY, Rawlins Field Office, BLM, PD
T. 16 N., R. 92 W., Sixth Principal
Sec. 2 LOTS 9 thru 20;
Sec. 2 S1/2;
Sec. 3 LOTS 9 thru 20;
Sec. 3 S1/2;
Sec. 23 S1/2;
Sec. 28 E1/2.
Carbon County
2232.32 Acres
Rental $6,699.00
12.50% Royalty Rate

Stipulations:

WY STD LEASE STIPULATION NO. 3 BLM Stipulation for Multiple Mineral Development
WY RFO_CSU_AR BLM Stipulation CSU for Amphibians and Reptiles
WY RFO_CSU_RN BLM Stipulation CSU for Raptor Nests
HQ-CR-1 BLM Lease Notice LN for Cultural Resource Protection
HQ-MLA-1 BLM Lease Notice LN for Notice to Lessee Concerning Mineral Leasing Act Section 2(a)(2)(A)
HQ-TES-1 BLM Lease Notice LN for Threatened and Endangered Species Act
WY RFO_LN_BGCWC BLM Lease Notice LN for Big Game Crucial Winter Range and/or Identified Migration Corridors
WY STD LEASE NOTICE NO 1 BLM Lease Notice LN for Reasonable Measures to Minimize Adverse Impacts to Resources
WY STD LEASE NOTICE NO. 2 BLM Lease Notice LN for National Historic Trails
WY STD LEASE NOTICE NO. 3 BLM Lease Notice LN for Greater Sage-Grouse Habitat
WY STD NOTICE TO LESSEE BLM Lease Notice LN for Attachment to Each Lease. Mineral Leasing Act requirements with respect to coal leasing
WY RFO_TLS_BGCW BLM Stipulation TL for Big Game Crucial Winter Range
WY RFO_TLS_BON BLM Stipulation TL for Burrowing Owl Nests
WY RFO_TLS_MPN BLM Stipulation TL for Mountain Plover Nests
WY RFO_TLS_RN BLM Stipulation TL for Raptor Nests
WY SW_TLS_GHMAL BLM Stipulation TL for Greater Sage-Grouse breeding, nesting, etc. Within 2 miles of an occupied lek outside Priority Habitat Management Areas

EOI #WY00020647, WY00020648, WY00020649, WY00020651

WY-2026-06-2381 Split Estate
WYWY106788905
WY, Rawlins Field Office, BLM, PD
T. 16 N., R. 92 W., Sixth Principal
Sec. 9 ALL;
Sec. 22 ALL;
Sec. 26 ALL.
Carbon County
1920 Acres
Rental $5,760.00
12.50% Royalty Rate

Stipulations:
WY STD LEASE STIPULATION NO. 3 BLM Stipulation for Multiple Mineral Development
WY RFO_CSU_AR BLM Stipulation CSU for Amphibians and Reptiles
WY RFO_CSU_HTRAILS BLM Stipulation CSU for Historic Trails
WY RFO_CSU_RN BLM Stipulation CSU for Raptor Nests
HQ-CR-1 BLM Lease Notice LN for Cultural Resource Protection
HQ-MLA-1 BLM Lease Notice LN for Notice to Lessee Concerning Mineral Leasing Act Section 2(a)(2)(A)
HQ-TES-1 BLM Lease Notice LN for Threatened and Endangered Species Act
WY RFO_LN_BGCWC BLM Lease Notice LN for Big Game Crucial Winter Range and/or Identified Migration Corridors
WY STD LEASE NOTICE NO 1 BLM Lease Notice LN for Reasonable Measures to Minimize Adverse Impacts to Resources
WY STD LEASE NOTICE NO. 2 BLM Lease Notice LN for National Historic Trails
WY STD LEASE NOTICE NO. 3 BLM Lease Notice LN for Greater Sage-Grouse Habitat
WY STD NOTICE TO LESSEE BLM Lease Notice LN for Attachment to Each Lease. Mineral Leasing Act requirements with respect to coal leasing
WY SW_NSO_GHMAL BLM Stipulation NSO for Greater Sage-Grouse Leks. Within 0.25-mile radius of occupied leks outside Priority Habitat Management Areas
WY RFO_TLS_BGCW BLM Stipulation TL for Big Game Crucial Winter Range
WY RFO_TLS_BON BLM Stipulation TL for Burrowing Owl Nests
WY RFO_TLS_MPN BLM Stipulation TL for Mountain Plover Nests
WY RFO_TLS_RN BLM Stipulation TL for Raptor Nests
WY SW_TLS_GHMAL BLM Stipulation TL for Greater Sage-Grouse breeding, nesting, etc. Within 2 miles of an occupied lek outside Priority Habitat Management Areas

EOI #WY00020602, WY00020603, WY00020604

WY-2026-06-2382 Split Estate
WYWY106788906
WY, Rawlins Field Office, BLM, PD
T. 16 N., R. 92 W., Sixth Principal
Sec. 27 ALL;
Sec. 34 ALL;
Sec. 35 ALL.
Carbon County
1920 Acres
Rental $5,760.00
12.50% Royalty Rate

Stipulations:

WY STD LEASE STIPULATION NO. 3 BLM Stipulation for Multiple Mineral Development
WY RFO_CSU_AR BLM Stipulation CSU for Amphibians and Reptiles
WY RFO_CSU_HTRAILS BLM Stipulation CSU for Historic Trails
WY RFO_CSU_RN BLM Stipulation CSU for Raptor Nests
HQ-CR-1 BLM Lease Notice LN for Cultural Resource Protection
HQ-MLA-1 BLM Lease Notice LN for Notice to Lessee Concerning Mineral Leasing Act Section 2(a)(2)(A)
HQ-TES-1 BLM Lease Notice LN for Threatened and Endangered Species Act
WY RFO_LN_BGCWC BLM Lease Notice LN for Big Game Crucial Winter Range and/or Identified Migration Corridors
WY STD LEASE NOTICE NO 1 BLM Lease Notice LN for Reasonable Measures to Minimize Adverse Impacts to Resources
WY STD LEASE NOTICE NO. 2 BLM Lease Notice LN for National Historic Trails
WY STD LEASE NOTICE NO. 3 BLM Lease Notice LN for Greater Sage-Grouse Habitat
WY STD NOTICE TO LESSEE BLM Lease Notice LN for Attachment to Each Lease. Mineral Leasing Act requirements with respect to coal leasing
WY RFO_TLS_BGCW BLM Stipulation TL for Big Game Crucial Winter Range
WY RFO_TLS_BON BLM Stipulation TL for Burrowing Owl Nests
WY RFO_TLS_MPN BLM Stipulation TL for Mountain Plover Nests
WY RFO_TLS_RN BLM Stipulation TL for Raptor Nests
WY SW_TLS_GHMAL BLM Stipulation TL for Greater Sage-Grouse breeding, nesting, etc. Within 2 miles of an occupied lek outside Priority Habitat Management Areas

EOI #WY00020605, WY00020606, WY00020608

WY-2026-06-2365 Split Estate
WYWY106788907
WY, Rawlins Field Office, BLM, PD
T. 17 N., R. 92 W., Sixth Principal
Sec. 24 LOTS 13 thru 16;
Sec. 35 LOTS 1 thru 8.
Carbon County
535.89 Acres
Rental $1,608.00
12.50% Royalty Rate

Stipulations:

WY STD LEASE STIPULATION NO. 3 BLM Stipulation for Multiple Mineral Development
WY RFO_CSU_RN BLM Stipulation CSU for Raptor Nests
HQ-CR-1 BLM Lease Notice LN for Cultural Resource Protection
HQ-MLA-1 BLM Lease Notice LN for Notice to Lessee Concerning Mineral Leasing Act Section 2(a)(2)(A)
HQ-TES-1 BLM Lease Notice LN for Threatened and Endangered Species Act
WY RFO_LN_BGCWC BLM Lease Notice LN for Big Game Crucial Winter Range and/or Identified Migration Corridors
WY STD LEASE NOTICE NO 1 BLM Lease Notice LN for Reasonable Measures to Minimize Adverse Impacts to Resources
WY STD LEASE NOTICE NO. 2 BLM Lease Notice LN for National Historic Trails
WY STD LEASE NOTICE NO. 3 BLM Lease Notice LN for Greater Sage-Grouse Habitat
WY STD NOTICE TO LESSEE BLM Lease Notice LN for Attachment to Each Lease. Mineral Leasing Act requirements with respect to coal leasing
WY RFO_TLS_BGCW BLM Stipulation TL for Big Game Crucial Winter Range
WY RFO_TLS_BON BLM Stipulation TL for Burrowing Owl Nests
WY RFO_TLS_RN BLM Stipulation TL for Raptor Nests

EOI #WY00020645, WY00020646

WY-2026-06-2380 Split Estate
WYWY106788908
WY, Rawlins Field Office, BLM, PD
T. 17 N., R. 92 W., Sixth Principal
Sec. 26 ALL.
Carbon County
640 Acres
Rental $1,920.00
12.50% Royalty Rate

Stipulations:

WY STD LEASE STIPULATION NO. 3 BLM Stipulation for Multiple Mineral Development
WY RFO_CSU_RN BLM Stipulation CSU for Raptor Nests
HQ-CR-1 BLM Lease Notice LN for Cultural Resource Protection
HQ-MLA-1 BLM Lease Notice LN for Notice to Lessee Concerning Mineral Leasing Act Section 2(a)(2)(A)
HQ-TES-1 BLM Lease Notice LN for Threatened and Endangered Species Act
WY RFO_LN_BGCWC BLM Lease Notice LN for Big Game Crucial Winter Range and/or Identified Migration Corridors
WY STD LEASE NOTICE NO 1 BLM Lease Notice LN for Reasonable Measures to Minimize Adverse Impacts to Resources
WY STD LEASE NOTICE NO. 2 BLM Lease Notice LN for National Historic Trails
WY STD LEASE NOTICE NO. 3 BLM Lease Notice LN for Greater Sage-Grouse Habitat
WY STD NOTICE TO LESSEE BLM Lease Notice LN for Attachment to Each Lease. Mineral Leasing Act requirements with respect to coal leasing
WY RFO_TLS_BGCW BLM Stipulation TL for Big Game Crucial Winter Range
WY RFO_TLS_BON BLM Stipulation TL for Burrowing Owl Nests
WY RFO_TLS_RN BLM Stipulation TL for Raptor Nests

EOI #WY00020597

WY-2026-06-2288 Split Estate
WYWY106788909
WY, Lander Field Office, BLM, PD
T. 39 N., R. 92 W., Sixth Principal
Sec. 31 LOTS 1;
Sec. 31 N1/2NE1/4, NE1/4NW1/4.
Fremont County
157.75 Acres
Rental $474.00
12.50% Royalty Rate

Stipulations:

WY STD LEASE STIPULATION NO. 3 BLM Stipulation for Multiple Mineral Development
WY LFO_CSU_LRPS1013 BLM Stipulation CSU for Limited Reclamation Potential Soils
WY LFO_CSU_PYFC5058 BLM Stipulation CSU for Fossil Resources
HQ-CR-1 BLM Lease Notice LN for Cultural Resource Protection
HQ-MLA-1 BLM Lease Notice LN for Notice to Lessee Concerning Mineral Leasing Act Section 2(a)(2)(A)
HQ-TES-1 BLM Lease Notice LN for Threatened and Endangered Species Act
WY STD LEASE NOTICE NO 1 BLM Lease Notice LN for Reasonable Measures to Minimize Adverse Impacts to Resources

WY STD LEASE NOTICE NO. 2 BLM Lease Notice LN for National Historic Trails
WY STD LEASE NOTICE NO. 3 BLM Lease Notice LN for Greater Sage-Grouse Habitat
WY STD NOTICE TO LESSEE BLM Lease Notice LN for Attachment to Each Lease. Mineral Leasing Act requirements with respect to coal leasing
WY LFO_NSO_PSW4031 BLM Stipulation NSO for Perennial Surface Waters, Riparian-Wetland Areas, and/or Playas Outside of Designated Development Areas
WY LFO_NSO_PSWDDA4031 BLM Stipulation NSO for Perennial Surface Waters, Riparian-Wetland Areas, and/or Playas Within Designated Development Areas
WY LFO_TLS_BGCW4061 BLM Stipulation TL for Big Game Crucial Winter Range
WY LFO_TLS_RN4071 BLM Stipulation TL for Raptor Nests

EOI #WY00020496

WY-2026-06-2443
WYWY106788910
WY, Rawlins Field Office, BLM, PD
T. 15 N., R. 94 W., Sixth Principal
Sec. 3 LOTS 1 thru 4;
Sec. 3 S1/2NE1/4, S1/2NW1/4, S1/2.
Sweetwater County
642.21 Acres
Rental $1,929.00
12.50% Royalty Rate

Stipulations:

WY STD LEASE STIPULATION NO. 3 BLM Stipulation for Multiple Mineral Development
WY RFO_CSU_AR BLM Stipulation CSU for Amphibians and Reptiles
WY RFO_CSU_RN BLM Stipulation CSU for Raptor Nests
HQ-CR-1 BLM Lease Notice LN for Cultural Resource Protection
HQ-MLA-1 BLM Lease Notice LN for Notice to Lessee Concerning Mineral Leasing Act Section 2(a)(2)(A)
HQ-TES-1 BLM Lease Notice LN for Threatened and Endangered Species Act
WY STD LEASE NOTICE NO 1 BLM Lease Notice LN for Reasonable Measures to Minimize Adverse Impacts to Resources
WY STD LEASE NOTICE NO. 2 BLM Lease Notice LN for National Historic Trails
WY STD LEASE NOTICE NO. 3 BLM Lease Notice LN for Greater Sage-Grouse Habitat
WY STD NOTICE TO LESSEE BLM Lease Notice LN for Attachment to Each Lease. Mineral Leasing Act requirements with respect to coal leasing
WY RFO_TLS_BGCW BLM Stipulation TL for Big Game Crucial Winter Range
WY RFO_TLS_MPN BLM Stipulation TL for Mountain Plover Nests
WY RFO_TLS_RN BLM Stipulation TL for Raptor Nests
WY SW_TLS_GHMAL BLM Stipulation TL for Greater Sage-Grouse breeding, nesting, etc. Within 2 miles of an occupied lek outside Priority Habitat Management Areas

EOI #WY00020720

WY-2026-06-2372
WYWY106788911
WY, Rawlins Field Office, BLM, PD
T. 16 N., R. 94 W., Sixth Principal
Sec. 14 ALL;
Sec. 15 ALL;
Sec. 17 ALL.
Sweetwater County
1920 Acres
Rental $5,760.00
12.50% Royalty Rate

Stipulations:
WY STD LEASE STIPULATION NO. 3 BLM Stipulation for Multiple Mineral Development
WY RFO_CSU_AR BLM Stipulation CSU for Amphibians and Reptiles
WY RFO_CSU_RN BLM Stipulation CSU for Raptor Nests
HQ-CR-1 BLM Lease Notice LN for Cultural Resource Protection
HQ-MLA-1 BLM Lease Notice LN for Notice to Lessee Concerning Mineral Leasing Act Section 2(a)(2)(A)
HQ-TES-1 BLM Lease Notice LN for Threatened and Endangered Species Act
WY STD LEASE NOTICE NO 1 BLM Lease Notice LN for Reasonable Measures to Minimize Adverse Impacts to Resources
WY STD LEASE NOTICE NO. 2 BLM Lease Notice LN for National Historic Trails
WY STD LEASE NOTICE NO. 3 BLM Lease Notice LN for Greater Sage-Grouse Habitat
WY STD NOTICE TO LESSEE BLM Lease Notice LN for Attachment to Each Lease. Mineral Leasing Act requirements with respect to coal leasing
WY RFO_TLS_BGCW BLM Stipulation TL for Big Game Crucial Winter Range
WY RFO_TLS_BON BLM Stipulation TL for Burrowing Owl Nests
WY RFO_TLS_MPN BLM Stipulation TL for Mountain Plover Nests
WY RFO_TLS_RN BLM Stipulation TL for Raptor Nests
WY SW_TLS_GHMAL BLM Stipulation TL for Greater Sage-Grouse breeding, nesting, etc. Within 2 miles of an occupied lek outside Priority Habitat Management Areas

EOI #WY00020669

WY-2026-06-2402
WYWY106788912
WY, Rawlins Field Office, BLM, PD
T. 16 N., R. 94 W., Sixth Principal
Sec. 19 LOTS 1 thru 4;
Sec. 19 E1/2, E1/2NW1/4, E1/2SW1/4;
Sec. 21 ALL;
Sec. 22 ALL.
Sweetwater County
1886.96 Acres
Rental $5,661.00
12.50% Royalty Rate

Stipulations:

WY STD LEASE STIPULATION NO. 3 BLM Stipulation for Multiple Mineral Development
WY RFO_CSU_AR BLM Stipulation CSU for Amphibians and Reptiles
WY RFO_CSU_RN BLM Stipulation CSU for Raptor Nests
HQ-CR-1 BLM Lease Notice LN for Cultural Resource Protection
HQ-MLA-1 BLM Lease Notice LN for Notice to Lessee Concerning Mineral Leasing Act Section 2(a)(2)(A)
HQ-TES-1 BLM Lease Notice LN for Threatened and Endangered Species Act
WY STD LEASE NOTICE NO 1 BLM Lease Notice LN for Reasonable Measures to Minimize Adverse Impacts to Resources
WY STD LEASE NOTICE NO. 2 BLM Lease Notice LN for National Historic Trails
WY STD LEASE NOTICE NO. 3 BLM Lease Notice LN for Greater Sage-Grouse Habitat
WY STD NOTICE TO LESSEE BLM Lease Notice LN for Attachment to Each Lease. Mineral Leasing Act requirements with respect to coal leasing
WY RFO_TLS_BGCW BLM Stipulation TL for Big Game Crucial Winter Range
WY RFO_TLS_BON BLM Stipulation TL for Burrowing Owl Nests
WY RFO_TLS_MPN BLM Stipulation TL for Mountain Plover Nests
WY RFO_TLS_RN BLM Stipulation TL for Raptor Nests
WY SW_TLS_GHMAL BLM Stipulation TL for Greater Sage-Grouse breeding, nesting, etc. Within 2 miles of an occupied lek outside Priority Habitat Management Areas

EOI #WY00020671, WY00020672

WY-2026-06-7492
WYWY106788913
WY, Rawlins Field Office, BLM, PD
T. 16 N., R. 94 W., Sixth Principal
Sec. 23 ALL;
Sec. 26 ALL;
Sec. 28 ALL;
Sec. 29 S1/2.
Sweetwater County
2240 Acres
Rental $6,720.00
12.50% Royalty Rate

Stipulations:

WY STD LEASE STIPULATION NO. 3 BLM Stipulation for Multiple Mineral Development
WY RFO_CSU_AR BLM Stipulation CSU for Amphibians and Reptiles
WY RFO_CSU_RN BLM Stipulation CSU for Raptor Nests
HQ-CR-1 BLM Lease Notice LN for Cultural Resource Protection
HQ-MLA-1 BLM Lease Notice LN for Notice to Lessee Concerning Mineral Leasing Act Section 2(a)(2)(A)
HQ-TES-1 BLM Lease Notice LN for Threatened and Endangered Species Act
WY STD LEASE NOTICE NO 1 BLM Lease Notice LN for Reasonable Measures to Minimize Adverse Impacts to Resources
WY STD LEASE NOTICE NO. 2 BLM Lease Notice LN for National Historic Trails
WY STD LEASE NOTICE NO. 3 BLM Lease Notice LN for Greater Sage-Grouse Habitat
WY STD NOTICE TO LESSEE BLM Lease Notice LN for Attachment to Each Lease. Mineral Leasing Act requirements with respect to coal leasing
WY RFO_TLS_BGCW BLM Stipulation TL for Big Game Crucial Winter Range
WY RFO_TLS_BON BLM Stipulation TL for Burrowing Owl Nests
WY RFO_TLS_MPN BLM Stipulation TL for Mountain Plover Nests
WY RFO_TLS_RN BLM Stipulation TL for Raptor Nests

EOI #WY00020674, WY00020675

WY-2026-06-7493
WYWY106788914
WY, Rawlins Field Office, BLM, PD
T. 16 N., R. 94 W., Sixth Principal
Sec. 30 LOTS 1 thru 4;
Sec. 30 E1/2, E1/2NW1/4, E1/2SW1/4;
Sec. 31 LOTS 1 thru 4;
Sec. 31 E1/2, E1/2NW1/4, E1/2SW1/4;
Sec. 32 ALL.
Sweetwater County
1863.52 Acres
Rental $5,592.00
12.50% Royalty Rate

Stipulations:

WY STD LEASE STIPULATION NO. 3 BLM Stipulation for Multiple Mineral Development
WY RFO_CSU_AR BLM Stipulation CSU for Amphibians and Reptiles
WY RFO_CSU_RN BLM Stipulation CSU for Raptor Nests
HQ-CR-1 BLM Lease Notice LN for Cultural Resource Protection
HQ-MLA-1 BLM Lease Notice LN for Notice to Lessee Concerning Mineral Leasing Act Section 2(a)(2)(A)
HQ-TES-1 BLM Lease Notice LN for Threatened and Endangered Species Act
WY STD LEASE NOTICE NO 1 BLM Lease Notice LN for Reasonable Measures to Minimize Adverse Impacts to Resources
WY STD LEASE NOTICE NO. 2 BLM Lease Notice LN for National Historic Trails
WY STD LEASE NOTICE NO. 3 BLM Lease Notice LN for Greater Sage-Grouse Habitat
WY STD NOTICE TO LESSEE BLM Lease Notice LN for Attachment to Each Lease. Mineral Leasing Act requirements with respect to coal leasing
WY RFO_TLS_BGCW BLM Stipulation TL for Big Game Crucial Winter Range
WY RFO_TLS_BON BLM Stipulation TL for Burrowing Owl Nests
WY RFO_TLS_RN BLM Stipulation TL for Raptor Nests
WY SW_TLS_GHMAL BLM Stipulation TL for Greater Sage-Grouse breeding, nesting, etc. Within 2 miles of an occupied lek outside Priority Habitat Management Areas

EOI #WY00020677, WY00020679, WY00020681

WY-2026-06-7489
WYWY106788915
WY, Rawlins Field Office, BLM, PD
T. 16 N., R. 94 W., Sixth Principal
Sec. 33 ALL.
Sweetwater County
640 Acres
Rental $1,920.00
12.50% Royalty Rate

Stipulations:

WY STD LEASE STIPULATION NO. 3 BLM Stipulation for Multiple Mineral Development
WY RFO_CSU_AR BLM Stipulation CSU for Amphibians and Reptiles
WY RFO_CSU_RN BLM Stipulation CSU for Raptor Nests
HQ-CR-1 BLM Lease Notice LN for Cultural Resource Protection
HQ-MLA-1 BLM Lease Notice LN for Notice to Lessee Concerning Mineral Leasing Act Section 2(a)(2)(A)
HQ-TES-1 BLM Lease Notice LN for Threatened and Endangered Species Act
WY STD LEASE NOTICE NO 1 BLM Lease Notice LN for Reasonable Measures to Minimize Adverse Impacts to Resources
WY STD LEASE NOTICE NO. 2 BLM Lease Notice LN for National Historic Trails
WY STD LEASE NOTICE NO. 3 BLM Lease Notice LN for Greater Sage-Grouse Habitat
WY STD NOTICE TO LESSEE BLM Lease Notice LN for Attachment to Each Lease. Mineral Leasing Act requirements with respect to coal leasing
WY RFO_TLS_BGCW BLM Stipulation TL for Big Game Crucial Winter Range
WY RFO_TLS_BON BLM Stipulation TL for Burrowing Owl Nests
WY RFO_TLS_MPN BLM Stipulation TL for Mountain Plover Nests
WY RFO_TLS_RN BLM Stipulation TL for Raptor Nests
WY SW_TLS_GHMAL BLM Stipulation TL for Greater Sage-Grouse breeding, nesting, etc. Within 2 miles of an occupied lek outside Priority Habitat Management Areas

EOI #WY00020683

WY-2026-06-2388
WYWY106788916
WY, Rawlins Field Office, BLM, PD
T. 17 N., R. 94 W., Sixth Principal
Sec. 6 LOTS 3 thru 7;
Sec. 6 SE1/4NW1/4, E1/2SW1/4, SE1/4.
Sweetwater County
481.14 Acres
Rental $1,446.00
12.50% Royalty Rate

Stipulations:

WY STD LEASE STIPULATION NO. 3 BLM Stipulation for Multiple Mineral Development
WY RFO_CSU_AR BLM Stipulation CSU for Amphibians and Reptiles
WY RFO_CSU_RN BLM Stipulation CSU for Raptor Nests
HQ-CR-1 BLM Lease Notice LN for Cultural Resource Protection
HQ-MLA-1 BLM Lease Notice LN for Notice to Lessee Concerning Mineral Leasing Act Section 2(a)(2)(A)
HQ-TES-1 BLM Lease Notice LN for Threatened and Endangered Species Act
WY STD LEASE NOTICE NO 1 BLM Lease Notice LN for Reasonable Measures to Minimize Adverse Impacts to Resources
WY STD LEASE NOTICE NO. 2 BLM Lease Notice LN for National Historic Trails
WY STD LEASE NOTICE NO. 3 BLM Lease Notice LN for Greater Sage-Grouse Habitat
WY STD NOTICE TO LESSEE BLM Lease Notice LN for Attachment to Each Lease. Mineral Leasing Act requirements with respect to coal leasing
WY RFO_TLS_BGCW BLM Stipulation TL for Big Game Crucial Winter Range
WY RFO_TLS_BON BLM Stipulation TL for Burrowing Owl Nests
WY RFO_TLS_MPN BLM Stipulation TL for Mountain Plover Nests
WY RFO_TLS_RN BLM Stipulation TL for Raptor Nests

EOI #WY00020622

WY-2026-06-2459
WYWY106788917
WY, Rawlins Field Office, BLM, PD
T. 19 N., R. 94 W., Sixth Principal
Sec. 6 LOTS 1 thru 7;
Sec. 6 S1/2NE1/4, SE1/4NW1/4, E1/2SW1/4, SE1/4;
Sec. 12 NE1/4.
Sweetwater County
811.52 Acres
Rental $2,436.00
12.50% Royalty Rate

Stipulations:

WY STD LEASE STIPULATION NO. 3 BLM Stipulation for Multiple Mineral Development
WY RFO_CSU_AR BLM Stipulation CSU for Amphibians and Reptiles
WY RFO_CSU_HTRAILS BLM Stipulation CSU for Historic Trails
HQ-CR-1 BLM Lease Notice LN for Cultural Resource Protection
HQ-MLA-1 BLM Lease Notice LN for Notice to Lessee Concerning Mineral Leasing Act Section 2(a)(2)(A)
HQ-TES-1 BLM Lease Notice LN for Threatened and Endangered Species Act
WY STD LEASE NOTICE NO 1 BLM Lease Notice LN for Reasonable Measures to Minimize Adverse Impacts to Resources
WY STD LEASE NOTICE NO. 2 BLM Lease Notice LN for National Historic Trails
WY STD LEASE NOTICE NO. 3 BLM Lease Notice LN for Greater Sage-Grouse Habitat
WY STD NOTICE TO LESSEE BLM Lease Notice LN for Attachment to Each Lease. Mineral Leasing Act requirements with respect to coal leasing
WY RFO_NSO_HTRAILS BLM Stipulation NSO for Historic Trails w/in 1/4 mile of contributing segments
WY RFO_TLS_BGCW BLM Stipulation TL for Big Game Crucial Winter Range
WY RFO_TLS_MPN BLM Stipulation TL for Mountain Plover Nests

EOI #WY00020724

WY-2026-06-7495 Split Estate
WYWY106788918
WY, Rawlins Field Office, BLM, PD
T. 20 N., R. 94 W., Sixth Principal
Sec. 30 LOTS 5 thru 20;
Sec. 34 LOTS 1 thru 10;
Sec. 34 NW1/4NE1/4NW1/4NW1/4, NE1/4NW1/4NW1/4NW1/4,
SE1/4NW1/4NW1/4, NE1/4SW1/4NW1/4.
Sweetwater County
717.6 Acres
Rental $2,154.00
12.50% Royalty Rate

Stipulations:

WY STD LEASE STIPULATION NO. 3 BLM Stipulation for Multiple Mineral Development
WY RFO_CSU_AR BLM Stipulation CSU for Amphibians and Reptiles
WY RFO_CSU_HTRAILS BLM Stipulation CSU for Historic Trails
WY RFO_CSU_RN BLM Stipulation CSU for Raptor Nests
HQ-CR-1 BLM Lease Notice LN for Cultural Resource Protection
HQ-MLA-1 BLM Lease Notice LN for Notice to Lessee Concerning Mineral Leasing Act Section 2(a)(2)(A)
HQ-TES-1 BLM Lease Notice LN for Threatened and Endangered Species Act
WY STD LEASE NOTICE NO 1 BLM Lease Notice LN for Reasonable Measures to Minimize Adverse Impacts to Resources
WY STD LEASE NOTICE NO. 2 BLM Lease Notice LN for National Historic Trails
WY STD LEASE NOTICE NO. 3 BLM Lease Notice LN for Greater Sage-Grouse Habitat
WY STD NOTICE TO LESSEE BLM Lease Notice LN for Attachment to Each Lease. Mineral Leasing Act requirements with respect to coal leasing
WY RFO_NSO_HTRAILS BLM Stipulation NSO for Historic Trails w/in 1/4 mile of contributing segments
WY RFO_TLS_BGCW BLM Stipulation TL for Big Game Crucial Winter Range
WY RFO_TLS_MPN BLM Stipulation TL for Mountain Plover Nests
WY RFO_TLS_RN BLM Stipulation TL for Raptor Nests

EOI #WY00020682

WY-2026-06-7494
WYWY106788919
WY, Rawlins Field Office, BLM, PD
T. 16 N., R. 95 W., Sixth Principal
Sec. 8 ALL;
Sec. 17 E1/2SE1/4.
Sweetwater County
720 Acres
Rental $2,160.00
12.50% Royalty Rate

Stipulations:
WY STD LEASE STIPULATION NO. 3 BLM Stipulation for Multiple Mineral Development
WY RFO_CSU_AR BLM Stipulation CSU for Amphibians and Reptiles
WY RSFO_CSU_Riparian/Fldplain BLM Stipulation CSU for RIPARIAN/FLOODPLAIN
HQ-CR-1 BLM Lease Notice LN for Cultural Resource Protection
HQ-MLA-1 BLM Lease Notice LN for Notice to Lessee Concerning Mineral Leasing Act Section 2(a)(2)(A)
HQ-TES-1 BLM Lease Notice LN for Threatened and Endangered Species Act
WY STD LEASE NOTICE NO 1 BLM Lease Notice LN for Reasonable Measures to Minimize Adverse Impacts to Resources
WY STD LEASE NOTICE NO. 2 BLM Lease Notice LN for National Historic Trails
WY STD LEASE NOTICE NO. 3 BLM Lease Notice LN for Greater Sage-Grouse Habitat
WY STD NOTICE TO LESSEE BLM Lease Notice LN for Attachment to Each Lease. Mineral Leasing Act requirements with respect to coal leasing
WY RFO_TLS_BGCW BLM Stipulation TL for Big Game Crucial Winter Range
WY RSFO_TLS_BGCW BLM Stipulation TL for Big Game Crucial Winter Range

EOI #WY00020693, WY00020703

WY-2026-06-2435
WYWY106788920
WY, Rawlins Field Office, BLM, PD
T. 16 N., R. 95 W., Sixth Principal
Sec. 18 LOTS 1 thru 4;
Sec. 18 E1/2, E1/2NW1/4, E1/2SW1/4;
Sec. 19 LOTS 3, 4;
Sec. 19 E1/2NE1/4, E1/2SW1/4, SE1/4;
Sec. 20 ALL.
Sweetwater County
1644.51 Acres
Rental $4,935.00
12.50% Royalty Rate

Stipulations:

WY STD LEASE STIPULATION NO. 3 BLM Stipulation for Multiple Mineral Development
WY RFO_CSU_AR BLM Stipulation CSU for Amphibians and Reptiles
WY RFO_CSU_RN BLM Stipulation CSU for Raptor Nests
HQ-CR-1 BLM Lease Notice LN for Cultural Resource Protection
HQ-MLA-1 BLM Lease Notice LN for Notice to Lessee Concerning Mineral Leasing Act Section 2(a)(2)(A)
HQ-TES-1 BLM Lease Notice LN for Threatened and Endangered Species Act
WY STD LEASE NOTICE NO 1 BLM Lease Notice LN for Reasonable Measures to Minimize Adverse Impacts to Resources
WY STD LEASE NOTICE NO. 2 BLM Lease Notice LN for National Historic Trails
WY STD LEASE NOTICE NO. 3 BLM Lease Notice LN for Greater Sage-Grouse Habitat
WY STD NOTICE TO LESSEE BLM Lease Notice LN for Attachment to Each Lease. Mineral Leasing Act requirements with respect to coal leasing
RSFO_NSO_Raptor Nesting Habitat BLM Stipulation NSO for Protecting Raptor Nesting Habitat
RSFO_TLS_Big Game Winter Range BLM Stipulation TL for Big Game Crucial Winter Range
WY RFO_TLS_BGCW BLM Stipulation TL for Big Game Crucial Winter Range
WY RFO_TLS_RN BLM Stipulation TL for Raptor Nests

EOI #WY00020707, WY00020710, WY00020711

WY-2026-06-7499
WYWY106788921
WY, Rawlins Field Office, BLM, PD
T. 16 N., R. 95 W., Sixth Principal
Sec. 25 ALL;
Sec. 30 LOTS 1 thru 4;
Sec. 30 E1/2, E1/2NW1/4, E1/2SW1/4;
Sec. 31 LOTS 1;
Sec. 31 NE1/4NW1/4.
Sweetwater County
1334.42 Acres
Rental $4,005.00
12.50% Royalty Rate

Stipulations:

WY STD LEASE STIPULATION NO. 3 BLM Stipulation for Multiple Mineral Development
WY RFO_CSU_AR BLM Stipulation CSU for Amphibians and Reptiles
WY RFO_CSU_RN BLM Stipulation CSU for Raptor Nests
HQ-CR-1 BLM Lease Notice LN for Cultural Resource Protection
HQ-MLA-1 BLM Lease Notice LN for Notice to Lessee Concerning Mineral Leasing Act Section 2(a)(2)(A)
HQ-TES-1 BLM Lease Notice LN for Threatened and Endangered Species Act
WY STD LEASE NOTICE NO 1 BLM Lease Notice LN for Reasonable Measures to Minimize Adverse Impacts to Resources
WY STD LEASE NOTICE NO. 2 BLM Lease Notice LN for National Historic Trails
WY STD LEASE NOTICE NO. 3 BLM Lease Notice LN for Greater Sage-Grouse Habitat
WY STD NOTICE TO LESSEE BLM Lease Notice LN for Attachment to Each Lease. Mineral Leasing Act requirements with respect to coal leasing
WY SW_NSO_GHMAL BLM Stipulation NSO for Greater Sage-Grouse Leks. Within 0.25-mile radius of occupied leks outside Priority Habitat Management Areas
WY RFO_TLS_BGCW BLM Stipulation TL for Big Game Crucial Winter Range
WY RFO_TLS_BON BLM Stipulation TL for Burrowing Owl Nests
WY RFO_TLS_MPN BLM Stipulation TL for Mountain Plover Nests
WY RFO_TLS_RN BLM Stipulation TL for Raptor Nests
WY SW_TLS_GHMAL BLM Stipulation TL for Greater Sage-Grouse breeding, nesting, etc. Within 2 miles of an occupied lek outside Priority Habitat Management Areas

EOI #WY00020715, WY00020716, WY00020718

WY-2026-06-2461
WYWY106788922
WY, Rawlins Field Office, BLM, PD
T. 19 N., R. 95 W., Sixth Principal
Sec. 2 LOTS 1 thru 4;
Sec. 2 S1/2NE1/4, S1/2NW1/4, S1/2.
Sweetwater County
641.59 Acres
Rental $1,926.00
12.50% Royalty Rate

Stipulations:

WY STD LEASE STIPULATION NO. 3 BLM Stipulation for Multiple Mineral Development
WY RFO_CSU_AR BLM Stipulation CSU for Amphibians and Reptiles
WY RFO_CSU_HTRAILS BLM Stipulation CSU for Historic Trails
WY RFO_CSU_RN BLM Stipulation CSU for Raptor Nests
HQ-CR-1 BLM Lease Notice LN for Cultural Resource Protection
HQ-MLA-1 BLM Lease Notice LN for Notice to Lessee Concerning Mineral Leasing Act Section 2(a)(2)(A)
HQ-TES-1 BLM Lease Notice LN for Threatened and Endangered Species Act
WY STD LEASE NOTICE NO 1 BLM Lease Notice LN for Reasonable Measures to Minimize Adverse Impacts to Resources
WY STD LEASE NOTICE NO. 2 BLM Lease Notice LN for National Historic Trails
WY STD LEASE NOTICE NO. 3 BLM Lease Notice LN for Greater Sage-Grouse Habitat
WY STD NOTICE TO LESSEE BLM Lease Notice LN for Attachment to Each Lease. Mineral Leasing Act requirements with respect to coal leasing
WY RFO_NSO_HTRAILS BLM Stipulation NSO for Historic Trails w/in 1/4 mile of contributing segments
WY RFO_TLS_BGCW BLM Stipulation TL for Big Game Crucial Winter Range
WY RFO_TLS_MPN BLM Stipulation TL for Mountain Plover Nests
WY RFO_TLS_RN BLM Stipulation TL for Raptor Nests

EOI #WY00020724

WY-2026-06-7490
WYWY106788923
WY, Rock Springs Field Office, BLM, PD
T. 17 N., R. 96 W., Sixth Principal
Sec. 34 ALL.
Sweetwater County
640 Acres
Rental $1,920.00
12.50% Royalty Rate

Stipulations:

WY STD LEASE STIPULATION NO. 3 BLM Stipulation for Multiple Mineral Development
HQ-CR-1 BLM Lease Notice LN for Cultural Resource Protection
HQ-MLA-1 BLM Lease Notice LN for Notice to Lessee Concerning Mineral Leasing Act Section 2(a)(2)(A)
HQ-TES-1 BLM Lease Notice LN for Threatened and Endangered Species Act
WY STD LEASE NOTICE NO 1 BLM Lease Notice LN for Reasonable Measures to Minimize Adverse Impacts to Resources
WY STD LEASE NOTICE NO. 2 BLM Lease Notice LN for National Historic Trails
WY STD LEASE NOTICE NO. 3 BLM Lease Notice LN for Greater Sage-Grouse Habitat
WY STD NOTICE TO LESSEE BLM Lease Notice LN for Attachment to Each Lease. Mineral Leasing Act requirements with respect to coal leasing
WY RSFO_TLS_BGCW BLM Stipulation TL for Big Game Crucial Winter Range

EOI #WY00020694

WY-2026-06-2447 Split Estate
WYWY10678892
WY, Rawlins Field Office, BLM, PD
T. 20 N., R. 96 W., Sixth Principal
Sec. 24 S1/2.
Sweetwater County
320 Acres
Rental $960.00
12.50% Royalty Rate

Stipulations:

WY STD LEASE STIPULATION NO. 3 BLM Stipulation for Multiple Mineral Development
WY RFO_CSU_AR BLM Stipulation CSU for Amphibians and Reptiles
HQ-CR-1 BLM Lease Notice LN for Cultural Resource Protection
HQ-MLA-1 BLM Lease Notice LN for Notice to Lessee Concerning Mineral Leasing Act Section 2(a)(2)(A)
HQ-TES-1 BLM Lease Notice LN for Threatened and Endangered Species Act
WY STD LEASE NOTICE NO 1 BLM Lease Notice LN for Reasonable Measures to Minimize Adverse Impacts to Resources
WY STD LEASE NOTICE NO. 2 BLM Lease Notice LN for National Historic Trails
WY STD LEASE NOTICE NO. 3 BLM Lease Notice LN for Greater Sage-Grouse Habitat
WY STD NOTICE TO LESSEE BLM Lease Notice LN for Attachment to Each Lease. Mineral Leasing Act requirements with respect to coal leasing
WY RFO_TLS_BGCW BLM Stipulation TL for Big Game Crucial Winter Range
WY RFO_TLS_MPN BLM Stipulation TL for Mountain Plover Nests

EOI #WY00020721

WY-2026-06-2294
WYWY106788925
WY, Rawlins Field Office, BLM, PD
T. 23 N., R. 96 W., Sixth Principal
Sec. 25 N1/2SW1/4SW1/4, N1/2SE1/4SW1/4.
Sweetwater County
40 Acres
Rental $120.00
12.50% Royalty Rate

Agreements:

WYWY105303777 This parcel is within approved Unit Agreement (UA) WYWY105303777, effective 12/30/2016. Before issuance of a lease for lands within an approved unit, the successful bidder may be required to join the unit (43 CFR 3101.3-1). Any lands included in this Notice that are determined to be in a unit prior to lease issuance are subject to regulation (43 CFR 3101.3-1).

Stipulations:

WY STD LEASE STIPULATION NO. 3 BLM Stipulation for Multiple Mineral Development
WY RFO_CSU_AR BLM Stipulation CSU for Amphibians and Reptiles
WY RFO_CSU_RN BLM Stipulation CSU for Raptor Nests
HQ-CR-1 BLM Lease Notice LN for Cultural Resource Protection
HQ-MLA-1 BLM Lease Notice LN for Notice to Lessee Concerning Mineral Leasing Act Section 2(a)(2)(A)
HQ-TES-1 BLM Lease Notice LN for Threatened and Endangered Species Act
WY RFO_LN_UW BLM Lease Notice LN for Unplugged Wellbores
WY STD LEASE NOTICE NO 1 BLM Lease Notice LN for Reasonable Measures to Minimize Adverse Impacts to Resources
WY STD LEASE NOTICE NO. 2 BLM Lease Notice LN for National Historic Trails
WY STD LEASE NOTICE NO. 3 BLM Lease Notice LN for Greater Sage-Grouse Habitat
WY STD NOTICE TO LESSEE BLM Lease Notice LN for Attachment to Each Lease. Mineral Leasing Act requirements with respect to coal leasing
WY RFO_TLS_BGCW BLM Stipulation TL for Big Game Crucial Winter Range
WY RFO_TLS_MPN BLM Stipulation TL for Mountain Plover Nests
WY RFO_TLS_RN BLM Stipulation TL for Raptor Nests

EOI #WY00020510

WY-2026-06-2046 Split Estate
WYWY106788926
WY, Pinedale Field Office, BLM, PD
T. 30 N., R. 113 W., Sixth Principal
Sec. 18 LOTS 1 thru 4;
Sec. 18 E1/2NW1/4, E1/2SW1/4, NW1/4SE1/4;
Sec. 19 LOTS 1 thru 3;
Sec. 19 E1/2, E1/2NW1/4, NE1/4SW1/4;
Sec. 30 NE1/4NE1/4.
Sublette County
985.37 Acres
Rental $2,958.00
12.50% Royalty Rate

Stipulations:

WY STD LEASE STIPULATION NO. 3 BLM Stipulation for Multiple Mineral Development
WY PFO_CSU_RN BLM Stipulation CSU for Raptor Nests
HQ-CR-1 BLM Lease Notice LN for Cultural Resource Protection
HQ-MLA-1 BLM Lease Notice LN for Notice to Lessee Concerning Mineral Leasing Act Section 2(a)(2)(A)
HQ-TES-1 BLM Lease Notice LN for Threatened and Endangered Species Act
WY STD LEASE NOTICE NO 1 BLM Lease Notice LN for Reasonable Measures to Minimize Adverse Impacts to Resources
WY STD LEASE NOTICE NO. 2 BLM Lease Notice LN for National Historic Trails
WY STD LEASE NOTICE NO. 3 BLM Lease Notice LN for Greater Sage-Grouse Habitat
WY SW_NSO_GHMAL BLM Stipulation NSO for Greater Sage-Grouse Leks. Within 0.25-mile radius of occupied leks outside Priority Habitat Management Areas
WY PFO_TLS_BEN BLM Stipulation TL for Bald Eagle Nests
WY PFO_TLS_BEWR BLM Stipulation TL for Bald Eagle Winter Roosts
WY PFO_TLS_BGCW BLM Stipulation TL for Big Game Crucial Winter Range
WY PFO_TLS_BONH BLM Stipulation TL for Burrowing Owl Nesting Habitat
WY PFO_TLS_RN BLM Stipulation TL for Raptor Nests
WY SW_TLS_GHMAL BLM Stipulation TL for Greater Sage-Grouse breeding, nesting, etc. Within 2 miles of an occupied lek outside Priority Habitat Management Areas

EOI #WY00018575

WY-2026-06-2038 Split Estate
WYWY106788927
WY, Pinedale Field Office, BLM, PD
T. 29 N., R. 114 W., Sixth Principal
Sec. 11 SW1/4NE1/4, W1/2, SE1/4;
Sec. 12 NW1/4SW1/4, S1/2SW1/4, S1/2SE1/4;
Sec. 13 ALL;
Sec. 14 ALL.
Sublette County
2000 Acres
Rental $6,000.00
12.50% Royalty Rate

Stipulations:

WY STD LEASE STIPULATION NO. 3 BLM Stipulation for Multiple Mineral Development
WY PFO_CSU_RN BLM Stipulation CSU for Raptor Nests
WY PFO_CSU_VRM BLM Stipulation CSU for Visual Resource Management Areas (Class I and II)
HQ-CR-1 BLM Lease Notice LN for Cultural Resource Protection
HQ-MLA-1 BLM Lease Notice LN for Notice to Lessee Concerning Mineral Leasing Act Section 2(a)(2)(A)
HQ-TES-1 BLM Lease Notice LN for Threatened and Endangered Species Act
WY STD LEASE NOTICE NO 1 BLM Lease Notice LN for Reasonable Measures to Minimize Adverse Impacts to Resources

WY STD LEASE NOTICE NO. 2 BLM Lease Notice LN for National Historic Trails
WY STD LEASE NOTICE NO. 3 BLM Lease Notice LN for Greater Sage-Grouse Habitat
WY STD NOTICE TO LESSEE BLM Lease Notice LN for Attachment to Each Lease. Mineral Leasing Act requirements with respect to coal leasing
WY SW_NSO_GHMAL BLM Stipulation NSO for Greater Sage-Grouse Leks. Within 0.25-mile radius of occupied leks outside Priority Habitat Management Areas
WY PFO_TLS_BEN BLM Stipulation TL for Bald Eagle Nests
WY PFO_TLS_BEWR BLM Stipulation TL for Bald Eagle Winter Roosts
WY PFO_TLS_BGCW BLM Stipulation TL for Big Game Crucial Winter Range
WY PFO_TLS_BGPR BLM Stipulation TL for Big Game Parturition
WY PFO_TLS_BONH BLM Stipulation TL for Burrowing Owl Nesting Habitat
WY PFO_TLS_RN BLM Stipulation TL for Raptor Nests
WY SW_TLS_GHMAL BLM Stipulation TL for Greater Sage-Grouse breeding, nesting, etc. Within 2 miles of an occupied lek outside Priority Habitat Management Areas

EOI #WY00018548, WY00018546

WY-2026-06-2067 Split Estate
WYWY106788928
WY, Pinedale Field Office, BLM, PD
T. 30 N., R. 114 W., Sixth Principal
Sec. 9 N1/2, N1/2SW1/4;
Sec. 10 N1/2, SW1/4, N1/2SE1/4, SW1/4SE1/4;
Sec. 12 N1/2NE1/4, SE1/4NE1/4, NW1/4, W1/2SW1/4, SE1/4SW1/4, S1/2SE1/4.
Sublette County
1480 Acres
Rental $4,440.00
12.50% Royalty Rate

Stipulations:

WY STD LEASE STIPULATION NO. 3 BLM Stipulation for Multiple Mineral Development
WY PFO_CSU_RN BLM Stipulation CSU for Raptor Nests
HQ-CR-1 BLM Lease Notice LN for Cultural Resource Protection
HQ-MLA-1 BLM Lease Notice LN for Notice to Lessee Concerning Mineral Leasing Act Section 2(a)(2)(A)
HQ-TES-1 BLM Lease Notice LN for Threatened and Endangered Species Act
WY STD LEASE NOTICE NO 1 BLM Lease Notice LN for Reasonable Measures to Minimize Adverse Impacts to Resources
WY STD LEASE NOTICE NO. 2 BLM Lease Notice LN for National Historic Trails
WY STD LEASE NOTICE NO. 3 BLM Lease Notice LN for Greater Sage-Grouse Habitat
WY STD NOTICE TO LESSEE BLM Lease Notice LN for Attachment to Each Lease. Mineral Leasing Act requirements with respect to coal leasing
WY PFO_TLS_BEN BLM Stipulation TL for Bald Eagle Nests
WY PFO_TLS_BEWR BLM Stipulation TL for Bald Eagle Winter Roosts
WY PFO_TLS_BGCW BLM Stipulation TL for Big Game Crucial Winter Range
WY PFO_TLS_BGPR BLM Stipulation TL for Big Game Parturition
WY PFO_TLS_BONH BLM Stipulation TL for Burrowing Owl Nesting Habitat
WY PFO_TLS_MPN BLM Stipulation TL for Mountain Plover Nests
WY PFO_TLS_RN BLM Stipulation TL for Raptor Nests
WY SW_TLS_GHMAL BLM Stipulation TL for Greater Sage-Grouse breeding, nesting, etc. Within 2 miles of an occupied lek outside Priority Habitat Management Areas

EOI #WY00018560, WY00018557

WY-2026-06-2088 Split Estate
WYWY106788929
WY, Pinedale Field Office, BLM, PD
T. 30 N., R. 114 W., Sixth Principal
Sec. 17 W1/2;
Sec. 18 LOTS 1 thru 4;
Sec. 18 E1/2, E1/2NW1/4, E1/2SW1/4;
Sec. 19 LOTS 1 thru 4;
Sec. 19 E1/2, E1/2NW1/4, E1/2SW1/4;
Sec. 20 E1/2, S1/2SW1/4.
Sublette County
1996.04 Acres
Rental $5,991.00
12.50% Royalty Rate

Stipulations:

WY STD LEASE STIPULATION NO. 3 BLM Stipulation for Multiple Mineral Development
WY PFO_CSU_RN BLM Stipulation CSU for Raptor Nests
WY PFO_CSU_VRM BLM Stipulation CSU for Visual Resource Management Areas (Class I and II)
HQ-CR-1 BLM Lease Notice LN for Cultural Resource Protection
HQ-MLA-1 BLM Lease Notice LN for Notice to Lessee Concerning Mineral Leasing Act Section 2(a)(2)(A)
HQ-TES-1 BLM Lease Notice LN for Threatened and Endangered Species Act
WY STD LEASE NOTICE NO 1 BLM Lease Notice LN for Reasonable Measures to Minimize Adverse Impacts to Resources
WY STD LEASE NOTICE NO. 2 BLM Lease Notice LN for National Historic Trails
WY STD LEASE NOTICE NO. 3 BLM Lease Notice LN for Greater Sage-Grouse Habitat
WY STD NOTICE TO LESSEE BLM Lease Notice LN for Attachment to Each Lease. Mineral Leasing Act requirements with respect to coal leasing
WY PFO_NSO_EFG BLM Stipulation NSO for Elk Feed Grounds
WY PFO_TLS_BEN BLM Stipulation TL for Bald Eagle Nests
WY PFO_TLS_BEWR BLM Stipulation TL for Bald Eagle Winter Roosts
WY PFO_TLS_BGCW BLM Stipulation TL for Big Game Crucial Winter Range
WY PFO_TLS_BGPR BLM Stipulation TL for Big Game Parturition
WY PFO_TLS_BONH BLM Stipulation TL for Burrowing Owl Nesting Habitat
WY PFO_TLS_EFG BLM Stipulation TL for Feed Ground Split Estate
WY PFO_TLS_RN BLM Stipulation TL for Raptor Nests

EOI #WY00018551, WY00018549

WY-2026-06-2073 Split Estate
WYWY106788930
WY, Pinedale Field Office, BLM, PD
T. 30 N., R. 114 W., Sixth Principal
Sec. 20 NW1/4, N1/2SW1/4;
Sec. 21 SW1/4.
Sublette County
400 Acres
Rental $1,200.00
12.50% Royalty Rate

Stipulations:

WY STD LEASE STIPULATION NO. 3 BLM Stipulation for Multiple Mineral Development
WY PFO_CSU_RN BLM Stipulation CSU for Raptor Nests
WY PFO_CSU_VRM BLM Stipulation CSU for Visual Resource Management Areas (Class I and II)
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WY PFO_TLS_BGPR BLM Stipulation TL for Big Game Parturition
WY PFO_TLS_BONH BLM Stipulation TL for Burrowing Owl Nesting Habitat
WY PFO_TLS_EFG BLM Stipulation TL for Feed Ground Split Estate
WY PFO_TLS_MPN BLM Stipulation TL for Mountain Plover Nests
WY PFO_TLS_RN BLM Stipulation TL for Raptor Nests

EOI #WY00018555, WY00018551, WY00018549

U.S. Bureau of Land Management
New Mexico State Office
Attn: State Director
Attn: Catherine Brewster
301 Dinosaur Trail
Santa Fe, NM 87508

U.S. Bureau of Land Management
Farmington Field Office
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2909 West Second Street
Roswell, NM 88201-2019

U.S. Bureau of Land Management
Wyoming State Office
5353 Yellowstone Rd
Cheyenne, WY 82009

Via Eplanning

Re: Protest Comments for the New Mexico and Wyoming Q2 2026 Oil and Gas Lease Parcel Sales (DOI-BLM-NM-F010-2026-0001-EA, DOI-BLM-NM-P000-2026-0001-EA, DOI-BLM-WY-0000-2026-0001-EA)

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Via Eplanning

Re: Protest Comments for the New Mexico and Wyoming Q2 2026 Oil and Gas Lease Parcel Sales (DOI-BLM-NM-F010-2026-0001-EA, DOI-BLM-NM-P000-2026-0001-EA, DOI-BLM-WY-0000-2026-0001-EA)

Appendix D

Below please find additional protest of the New Mexico lease sales.

Introduction re: Rio Puerco Field Office and Farmington Field Office Parcels

The Greater Chaco region is an ancient and living cultural landscape, spanning some 75,000 miles square miles of NM, AZ, CO and UT. Chaco Canyon, in Northwest New Mexico, was the cultural and economic center of many ancient indigenous cultures throughout the Southwest. Chaco Canyon itself is surrounded on all sides by ancient structures of enduring significance, as well as living communities, many of whom are Diné people living in their traditional homeland, within the boundaries of the four sacred mountains. The landscape itself, from the dramatic mesas to the wide, colorful sky, is teeming with physical and spiritual life of great significance to the indigenous peoples of the region.

Now, the vast majority of lands across the region are leased for fracking, with over 40,000 oil and gas wells scarring the landscape, exacerbating the climate crisis, and adversely affecting the land, air, water, health, and cultural resources of local people and communities.

Oil and gas development in the Greater Chaco region, originating with the dispossession of Indigenous lands and subsequent designation of the region as a "sacrifice zone," has left a legacy of adverse impacts on the largely Indigenous population that lives there. Once the oil and gas that is removed from the Greater Chaco region is shipped elsewhere and consumed, the greenhouse gases emitted contribute to the worsening climate catastrophe that threatens all life

on Earth—and especially harms people and communities already experiencing heavy burdens of pollution and extraction, environmental injustices, and adverse health, environmental, and cumulative impacts. The miles of roads, pipelines, heavy machinery and truck traffic scar the landscape, generate toxic gases, and degrade necessary public infrastructure relied on by the residential communities. The already-limited water sources in the region are both poisoned by fracking and consumed by oil and gas in ways that tangibly impact the residents of the Greater Chaco landscape: seeps that have fed sheep herds for generations dry up, and residents haul water for hours from Farmington or Gallup, rather than risk poisoned groundwater. It is in this context that we offer these comments.

As discussed above, nothing in the IRA or other recent and upcoming legislation or regulatory changes obviates the need for BLM to take a hard look at potentially significant impacts of oil and gas leasing and development, and otherwise meet its NEPA obligations for this lease sale and the federal oil and gas program as a whole.

Commenters have consistently participated in BLM decision-making for prior oil and gas leasing (and planning and permitting) in the Greater Chaco Region, including for the lease sales subject to these supplemental NEPA analyses. Therefore, Commenters incorporate by reference the prior administrative comments, protests, and exhibits submitted for these lease sales, for the Farmington RMPA-EIS, and for the Chaco Proposed Withdrawal, and other relevant comments and protests, including our:

- October 2014 Scoping Comments (submitted March 24, 2014), Draft Environmental Assessment Comments (May 28, 2014), and Protest (August 14, 2014);
- January 2015 Draft Environmental Assessment Comments (September 23, 2014) and Protest (November 19, 2014);
- October 2016 Scoping Comments (March 14, 2016);
- January 2017 Scoping Comments (June 17, 2016), Draft Environmental Assessment Comments (September 2, 2016), and Protest (December 6, 2016);
- March 2018 Draft Environmental Assessment Comments (October 20, 2017) and Protest (January 3, 2018);
- December 2018 Scoping Comments (July 20, 2018) and Protest (October 31, 2018);
- March 2019 Scoping Comments (October 19, 2018) and Protest (February 20, 2019);
- June 2019 Scoping Comments (February 10, 2019), Draft Environmental Assessment Comments (March 22, 2019), and Protest (April 31, 2019);
- September 2019 Draft Environmental Assessment Comments (May 24, 2019) and Protest (July 16, 2019);
- November 2019 Scoping Comments (June 10, 2019), Draft Environmental Assessment Comments (July 26, 2019), and Protest Comments (September 20, 2019);

- February 2020 Scoping Comments (September 9, 2019), and Draft Environmental Assessment Comments (October 28, 2019); and Protest Comments
- May 2020 Scoping Comments (December 4, 2019), Draft Environmental Assessment Comments and Protest Comments
- September 2020 Comments on Draft Farmington RMPA-EIS (September 25, 2020) and 2017 Scoping Comments
- May 2022 Comments on Proposed Chaco Withdrawal (May 6, 2022)
- July 2022 Comments on BLM's Supplemental Analyses
- December 2022 Comments on Proposed Chaco Withdrawal

Many of the exhibits for these comments were attached in our prior comments and protests for these leases sales, and are also incorporated by reference here. We have also attached additional exhibits with these comments. These incorporated comments and exhibits offer detailed technical information, expert reports, and legal analysis that BLM is required to consider in its decision- making process for the proposed action. *See Forest Guardians v. U.S. Fish and Wildlife Serv.*, 611 F.3d 692, 717 (10th Cir. 2010) ("The purpose behind NEPA is to ensure that the agency will only reach a decision on a proposed action after carefully considering the environmental impacts of several alternative courses of action and *after taking public comment into account*.") *Emphasis added*.

A. BLM Must Consider Flaring and its Impacts in the EA.

BLM must consider the impacts of methane emissions. Initial ground and aerial surveys conducted by the Environmental Defense Fund shows methane in the Permian Basin escaping at a rate three times higher than the national average.[1] Furthermore, aircraft measurements by the same project have revealed Permian emissions are 2-3 times higher than what the Environmental Protection Agency estimates in their inventory of greenhouse gas emissions.[2] Of the 1,320 emissions sources detected, 362, or approximately 27%, of these sources were malfunctioning flares – meaning that emissions may not be captured by state or federal estimates.[3] Also, 50% of "super emitters" came from midstream operations, which also may not be accounted for in existing analysis of new development. Furthermore, 2024 data showed that oil and gas producers across the US are emitting methane into the atmosphere at over four times the rates estimated by the Environmental Protection Agency – and the highest total methane emissions amongst the country's 12 major productions basins were in the Permian Basin.[4] BLM cannot defer the analysis of adding more methane to the already-saturated region to the APD stage, they should

[1] Environmental Defense Fund, *PermianMAP Final Report*, 2021. Available here: https://blogs.edf.org/energyexchange/wp-content/blogs.dir/38/files/2022/11/PermianMAPFinalReport.pdf, and attached as Exhibit 221.
[2] *Id* at 8.
[3] *Id.*
[4] **Exhibit 222,** Environmental Defense Fund (July 31, 2024), "As regulators, operators and investors face growing worldwide pressure to cut emissions, aircraft data offer crucial preview of new satellite capabilities." https://www.edf.org/media/new-data-show-us-oil-gas-methane-emissions-over-four-times-higher-epa-estimates-eight-times

take a hard look now at the impact of authorizing more oil and gas and subsequently more methane pollution in the region at the leasing stage.

We urge BLM to correct this deficiency and consider flaring and its impacts in the EA for this lease sale. BLM must:

- Consider an alternative that would mitigate flaring. To fulfill its legal obligation to prevent waste under the Mineral Leasing Act, we recommend that BLM consider a stipulation limiting flaring to situations where it is infeasible or unsafe to capture the gas and not allowing routine flaring where there is simply inadequate pipeline capacity or timing issues.

- Consider the direct, indirect, and cumulative socioeconomic impacts of flaring. A recent analysis conducted by Synapse Energy Economics calculated natural gas methane emissions volumes from venting, flaring, and leaks in the production segment on federal and tribal lands and determined the value of that lost gas in the form of (1) lost royalties, (2) lost state revenue from taxes, and (3) lost revenue from wasted natural gas that could be used for other purposes.

- Consider the direct, indirect, and cumulative human health impacts of flaring, including environmental justice impacts as mandated by NEPA.

B. BLM Must Take a Hard Look at the Impacts of Produced Water

a. BLM Must Analyze the Volume of Produced Water

BLM must analyze the volume of produced water that would be produced under each alternative. Specifically, BLM's alternatives analysis must account for the avoided impacts associated with reduced produced water generation and disposal. The no-action and managed decline alternatives would reduce the volume of produced water requiring transport, storage, and disposal, thereby reducing the frequency and severity of spills and contamination events. NEPA requires agencies to rigorously explore and objectively evaluate all reasonable alternatives. 42 U.S.C. § 4332(2)(C)(iii). By failing to quantify or meaningfully analyze these co-benefits, BLM does not provide the information necessary for a reasoned decision.

b. BLM must Analyze Other Impacts of Produced Water

Recent data from the State of New Mexico and independent analysis confirm that produced water management and disposal present ongoing, large-scale environmental risks that are not adequately analyzed in the Draft EA. In the first quarter of 2026 alone, operators reported over 9,000 oil and gas spills statewide, including approximately 1.4 million gallons of liquid waste released, with more than 588,000 gallons permanently lost to the environment.

Produced water accounted for the majority of spill volume and environmental loss, and recent trends show increasing severity of contamination events, even where total spill counts fluctuate. These findings are consistent with WildEarth Guardians' 2025 New Mexico Spill

Report, which documents more than 177,000 spills reported by industry to the state over a four-year period and demonstrates that oil and gas spill pollution is systemic, not incidental.[5] Spills routinely impact soils, groundwater, and surface waters, and once released, significant volumes of produced water are not recoverable, resulting in persistent contamination of environmental resources.[6] (See Appendix ## (WildEarth Guardians, 2025 New Mexico Spill Report).

BLM's analysis fails to incorporate this extensive record of spills and contamination into its assessment of produced water transport, storage, disposal, and potential reuse. By treating such releases as isolated or low-probability events, the agency fails to evaluate the actual, foreseeable environmental impacts of leasing.

c. BLM Must Analyze Leasing Stage Commitments and Timing of NEPA Review with regard to Produced Water.

The scale and frequency of oil and gas spills in New Mexico demonstrate that releases of produced water and other contaminants are reasonably foreseeable consequences of oil and gas leasing and production. Agencies must evaluate impacts that are reasonably foreseeable, even if they are not certain to occur. Where thousands of spills are reported annually, including large-volume releases resulting in permanent environmental loss, BLM cannot reasonably characterize such events as speculative or de minimis. The agency's failure to quantify spill frequency, analyze contaminant pathways, or evaluate the cumulative effects of repeated releases renders its NEPA analysis inadequate.

C. BLM Must Analyze Unnecessary or Undue Degradation Resulting from Produced Water.

BLM's failure to account for the routine release and loss of produced water violates its independent obligation under FLPMA to prevent unnecessary or undue degradation of public lands. 43 U.S.C. § 1732(b). The administrative record demonstrates that oil and gas operations in New Mexico routinely result in the release of large volumes of toxic waste to the environment, including spills that contaminate soils, groundwater, and surface waters and are not fully remediated.(see spill report/full analysis). In light of this record, BLM must explain how authorizing additional leasing will avoid or mitigate such degradation. Its failure to do so is arbitrary and inconsistent with FLPMA's substantive mandate. (See *Mineral Policy Ctr. v. Norton*, 292 F. Supp. 2d 30, 54 (D.D.C. 2003)).

D. BLM Must Take a Hard Look at Impacts on Big Game

BLM must fully evaluate the reasonably foreseeable impacts to big game from development on the proposed leases. This extends beyond a description of: (a) the regulatory and management frameworks applicable to big game species, along with the scientific literature, (b) existing conditions, and which lease parcels are in different categories of habitat (such as crucial winter habitat and migration corridors), (c) the lease stipulations that would apply, and (d) how

[5] **Exhibit 289,** WildEarth Guardians, 2025 New Mexico Spill Report, https://pdf.wildearthguardians.org/site/DocServer/WildEarth-Guardians-annual-spill-report-2025.pdf.
[6] *See* id.

BLM selected which parcels in big game habitat to offer or defer. Such information would provide a basis for analyzing the likely impacts to big game from development on the proposed leases—but it would not substitute for that analysis.[7] BLM's failure to analyze the likely impacts to big game populations from the leases it proposes to offer and boilerplate statements about categories of impacts would and do not satisfy NEPA. BLM instead must analyze the site-specific, direct, indirect, and cumulative impacts of leasing the parcels on the biology, ecology, reproduction, migration, connectivity, and viability of individual herds and entire populations of pronghorn, mule deer, and other big game species. This must be done for the proposed parcels in connection with parcels sold in other, past federal and non-federal oil and gas lease sales and developments.

E. BLM Must Take a Hard Look at Impacts of Oil and Gas Leasing and Development on the Endangered Dunes Sagebrush Lizard. BLM Should Defer Parcels Within, and Within 10 Miles of the Dunes Sagebrush Lizard Habitat.

The Dunes Sagebrush Lizard (*Sceloporus arenicolus*) ("DSL") was recently listed by the United States Fish & Wildlife Service ("The Service") as an endangered species under the Endangered Species Act ("ESA"). 89 Fed. Reg. 43,748–43,769 (May 20, 2024) (codified at 50 C.F.R. pt. 17). DSL are endemic to the shinnery oak dunelands and shrublands of the Mescalero Sandhills in southeastern New Mexico. The DSL is a habitat specialist, dependent upon shinnery oak duneland habitat to provide appropriate substrate for nests, cover for young, and to provide food resources as juvenile lizards mature into adults. DSL form small, localized populations called "neighborhoods" that are inter-connected through dispersal. Since the Mescalero and Monahans Sandhills are dynamic ecosystems, appropriate habitat patches for DSL can shift over time. Long-term stability is maintained through inter-connected neighborhoods. The DSL is composed of three evolutionary lineages that are both divergent and spatially discrete as identified by the Service: Northern Mescalero, Southern Mescalero, and Monahans. Both the Northern Mescalero and Southern Mescalero lineages are present only in New Mexico.

Due to their reliance on a very specific and restricted habitat within these sandhills, DSL are highly vulnerable to habitat loss and fragmentation. Destruction of habitat harms breeding, feeding, sheltering, dispersal, and survival, causing population losses and even destruction of whole populations. Habitat loss and fragmentation injure local population dynamics by reducing dispersal and inter-colonization. Unfortunately, degradation and fragmentation of shinnery oak dunelands are likely irreversible. Once disturbed, they shift to alternative stable states and attempts to restore this habitat have been unsuccessful.

The entire range of the DSL overlaps with the Permian Basin. The Permian Basin has experienced widespread development associated with the petroleum industry. DSL experience declines as density of oil well pads and associated infrastructure increases. Additionally, DSL are under increasing threat from mining of frac sand for use in hydraulic fracturing of oil and gas

[7] For an analysis of the impacts of oil and gas development on elk and mule deer, for example, *see* **Exhibit 116,** Erik Molvar et al, *Evaluating the cumulative effects of oil and gas development on elk and mule deer in the middle reaches of the Colorado River watershed near Silt, Colorado*, Western Watersheds Project & Redstone GIS (Sept. 8, 2023).

wells. Extraction of frac sand results in the loss of shinnery oak duneland habitat and promotes the degradation of surrounding sand dune landforms, creating further habitat degradation if the frac sand from mining and the hydrofracturing for oil and gas both occur within DSL habitat. Although there are other sources of habitat loss, oil extraction and frac sand mining are the primary drivers of landscape change in this region.

BLM administers the majority of DSL's remaining habitat within New Mexico. As such, BLM has a significant decision-making authority to either protect New Mexican DSL or to further threaten the existence of the species by leasing DSL inhabited federal lands for oil and gas exploration. BLM's lease sale in New Mexico, includes parcels within Lea and Eddy County that are DSL habitat. Leasing any parcels within DSL habitat will contribute to the exact threats that have eroded the species down to endangered status.

Preserving remaining DSL habitat is critical because the South Mescalero population already faces significant threats to its survival, specifically. BLM must take a hard look at the following threats DSL that will arise from leasing parcels in and near occupied habitat, and unoccupied habitat that, critically, may in the future be necessary to ensure the newly-ESA-listed lizard's survival and recovery. For these reasons, BLM should defer all parcels within or within 10 miles of the endangered DSL duneland, scrubland, and supportive habitat.

a. New Mexico Contains the Most Intact DSL Population (Northern Mescalero) and the Most Vulnerable DSL Population (Southern Mescalero), both located on BLM land.

Two populations of DSL call New Mexico home, Northern Mescalero and Southern Mescalero. A third distinct lineage is identified in Texas as the Monahans population. There are distinguishable phylogenetic lineages between the Northern and Southern Mescalero populations. [8] These two Mescalero population lineages represent separate colonization events that are estimated based on genetic data to have occurred 34,000 years ago (Northern Mescalero) and 16,000 years ago (Southern Mescalero).[9] These two lineages cover distinct portions of the species range, occur across a gradient of environmental conditions, and evolved in isolation, and thus the Service views these populations to represent critical contributions to the adaptive capacity of DSL. There appears to be no contemporary gene flow between these populations, except for a narrow contact zone between the North and South Mescalero lineages.[10] The Northern Mescalero unit represents 39 percent of DSL's range and contains the most DSL habitat by acreage, as well as the most habitat by acreage that is minimally disturbed.[11] In other words, the Northern Mescalero unit contains the largest quantities of intact DSL habitat.

[8] **Exhibit 223,** U.S. Fish and Wildlife Services, *Species Status Assessment for the Dunes Sagebrush Lizard*, 51 (April 2024) (Version 1.3) (hereafter "2024 DSL SSA"); Chan et al. 2009, p. 136; Chan et al. 2020, p. 6.
[9] **Exhibit 224.** Chan, L., C. Painter, M. Hill, T. Hibbitts, D. Leavitt, W. Ryberg, D. Walkup, and L. Fitzgerald. 2020. *Phylogeographic structure of the dunes sagebrush lizard, an endemic habitat specialist.* PLoS One 15(9): e0238194 p. 7 [hereinafter Chan et al. 2020].
[10] *Id.*
[11] Exhibit 223, 2024 DSL SSA at 98–110.

In contrast, the Southern Mescalero unit contains the most degraded, most segmented, DSL habitat of the three population lineages, representing 35 percent of DSL range.[12] "Both Analysis Units in the Southern Mescalero are in Low condition. The low viability of these units suggests that an entire phylogenetic lineage is currently at high risk for extirpation".[13] The Southern Mescalero population is graded low in its entirety placing it as the population most vulnerable to extirpation of the three. Since each of these populations are phylogenetically distinct the loss of any of these populations would be extremely detrimental to the species' adaptive capacity. *Id.* "Southern populations experience higher temperatures and drier conditions (See Chapter 3) and may have higher capacity to withstanding climate change. However, their poor current condition limits their potential to contribute to long-term adaptation of the species."[14] BLM's lease sale in New Mexico includes four parcels that are within the Southern Mescalero population, specifically the USFWS analysis unit titled South Mescalero 1 which has the lowest proportion of minimally disturbed duneland habitat.[15] In other words, this unit is the most degraded of all DSL population units within the most vulnerable of DSL populations. Any further oil and gas development on South Mescalero 1 risks tipping this lineage towards extinction. The four parcels in question are NM-2025-07-0477, NM-2025-07-0479, NM-2025-07-6858, and NM-2025-07-0490. [16]

ii. BLM Must Take a Hard Look at all Facets of Oil and Gas Detrimental Impacts to DSL.

The Service has analyzed multiple ways in which Oil and gas development harms DSL. When analyzing threats to the species the Service discussed oil and gas development under multiple threat factors including: Factor 1: Habitat Loss and Modification; Factor 2: Pollution and Contamination; Factor 4: Groundwater Depletion; and Factor 5: Direct Mortality.[17]

1. Habitat Loss, Fragmentation, and Modification

Habitat specialists such as DSL are more sensitive to habitat loss and fragmentation because of dependence on a limited range of habitat.[18] Due to their reliance on shinnery oak duneland habitat, DSL is highly susceptible to habitat loss and fragmentation.[19] At the individual-level, the removal of shinnery oak vegetation can impair DSL breeding including female nesting movements and juvenile dispersal, as well as feeding, sheltering for

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[12] *Id.*
[13]Exhibit 223, 2024 DSL SSA at 110
[14] *Id.*
[15] Exhibit 223, 2024 DSL SSA at 103.
[16] BLM, *July 2025 Oil & Gas Preliminary Parcel List*
[17]Exhibit 223, 2024 DSL SSA at 11–12.
[18] **Exhibit 225,** Henle, K., K. Davies, M. Kleyer, C. Margules, and J. Settele. 2004. *Predictors of Species Sensitivity to Fragmentation.* Biodiversity and Conservation 13: 207-251, 239 [hereinafter Henle et al. 2004]; **Exhibit 226,** Devictor, V., R. Julliard, and F. Jiguet. 2008. *Distribution of Specialist and Generalist Species along Spatial Gradients of Habitat Disturbance and Fragmentation.* Oikos 117: 507-514, 511 [hereinafter Devictor et al. 2008].
[19] **Exhibit 227,** Walkup, D.K., D.J. Leavitt, and L.A. Fitzgerald. 2017. *Effects of Habitat Fragmentation on Population Structure of Dune-Dwelling Lizards.* Ecosphere 8 (3):1-14 p. 2 [hereinafter Walkup et al. 2017].

thermoregulation and predator avoidance, dispersal, and survival.[20] At population-levels, habitat destruction and fragmentation can affect DSL viability in multiple ways. Loss of habitat can lead to the reduction or even loss of populations. DSL are short lived and exhibit low reproductive potential and low population recovery potential.[21] Species that exhibit these traits decline when confronted with fragmentation and are prone to extirpation.[22] Smaller populations occupying smaller patches are even more vulnerable to stochastic events. Fragmentation also disrupts landscape-scale dynamics of the dune-blowout DSL ecosystem, resulting in degradation of dune-blowout landforms beyond the immediate footprint of developed areas, so fragmentation disruptions are not limited to oil/gas immediate development footprint.[23] Fragmented sites are often of lower quality, possessing fewer, more dispersed large dune blowouts as well as more large patches of flat open sand and barren ground, thus deterring DSL habitation.[24]. Declines in population abundance due to reductions in habitat results in genetic diversity losses, reduced dispersal of DSL due to fragmentation, and reduced gene flow. This in turn leads to inbreeding

[20] **Exhibit 228,** Machenberg, M. 1984. *Geology of Monahans Sandhills State Park, Texas.* Guidebook 21. University of Texas at Austin. Bureau of Economic Geology pp. 16, 20-21 [hereinafter Machenberg 1984]; **Exhibit 229,** Degenhardt, W.G., C.W. Painter, and A.H. Price. 1996. *Amphibians and Reptiles of New Mexico.* University of New Mexico Press. Albuquerque. 431 pp., p. 160 [hereinafter Degenhardt et al. 1996]; **Exhibit 230,** Snell, H.L., L.W. Gorum, L.J.S. Pierce, and K.W. Ward. 1997. *Results from the fifth year (1995) research on the effect of shinnery oak removal on populations of sand dune lizards, Sceloporus arenicolus, in New Mexico.* Final Report to New Mexico Department of Game and Fish. Contract #80-516.6-01 13 pp, pp. 1-2, 6-11 [hereinafter Snell et al. 1997]; **Exhibit 231,** Fitzgerald, L., C. Painter, D. Sias, and H. Snell. 1997. *The Range, Distribution and Habitat of Sceloporus arenicolus in New Mexico*. Final Report submitted to New Mexico Department of Game and Fish (Contract #80-516.6-01) p. 26 [hereinafter Fitzgerald et al. 1997]; **Exhibit 232,** Peterson, R., and C.S. Boyd. 1998. *Ecology and management of sand shinnery communities: a literature review.* Gen. Tech. Rep. RMRS-GTR-16. Fort Collins, CO: U.S. Department of Agriculture, Forest Service, Rocky Mountain Research Station. 44 p., p.21 [hereinafter Peterson and Boyd 1998]; **Exhibit 233,** Painter, C., D. Sias, L. Fitzgerald, L. Pierce, and H. Snell. 1999. *Management Plan for the Sand Dune Lizard Sceloporus arenicolus in New Mexico*, pp. 1, 27 [hereinafter Painter et al. 1999]; **Exhibit 234,** Sartorius, S.S., J.P.S. do Amaral, R.D. Durtsche, C.M. Deen, and W.I. Luterschmidt. 2002. *Thermoregulatory accuracy, precision, and effectiveness in two sand-dwelling lizards under mild environmental conditions.* Canadian Journal of Zoology 80:1966-1976, pp. 1972-1975 [hereinafter Sartorius et al. 2002]; **Exhibit 235,** Painter, C., D. Sias, L. Fitzgerald, L. Pierce, and H. Snell. 1999. *Management Plan for the Sand Dune Lizard Sceloporus arenicolus in New Mexico*, p. 3-4 [hereinafter Painter 2004]; **Exhibit 236,** Dhillion, S.S., and M.H. Mills. 2009. The Sand Shinnery Oak (Quercus havardii) Communities of the Llano Estacado: History, Structure, Ecology, and Restoration in: R.A.Anderson, J.S. Fralish, and J.M. Baskin, eds. *Savannas, Barrens, and Rock Outcrop Plant Communities of North America*. 1999, p. 264 [hereinafter Dhillion and Mills 2009]; **Exhibit 237,** Leavitt, D.J., and M.R. Acre. 2014. *Sceloporus arenicolus (Dunes Sagebrush Lizard). Activity Patterns and Foraging Mode.* Herpetological Review 45(4). 699-700, p. 700 [hereinafter Leavitt and Acre 2014]; **Exhibit 238,** Hibbitts, T., and T. Hibbitts. 2015. *Texas Lizards: A Field Guide.* University of Texas Press. 352 pp, p. 157 [hereinafter Hibbitts and Hibbitts 2015].

[21] 2024 DSL SSA at 57.

[22] Henle 2004, p. 239; Devictor et al. 2008, p. 511; **Exhibit 239,** Hibbitts, T.J., W.A. Ryberg, C.S. Adams, A.M. Fields, D. Lay, and M.E. Young. 2013. *Microhabitat Selection by a Habitat Specialist and a Generalist in both Fragmented and Unfragmented Landscapes.* Herpetological Conservation and Biology 8(1): 104-113, p. 111 [hereinafter Hibbitts et al. 2013]; **Exhibit 240,** Leavitt, D., and L. Fitzgerald. 2013. *Disassembly of a Dune-dwelling Lizard Community due to Landscape Fragmentation.* Ecosphere 4(8): 97, p. 6 [hereinafter Leavitt and Fitzgerald 2013]; Walkup et al. 2017, p. 2.

[23] Leavitt and Fitzgerald 2013, p. 9; Walkup et al. 2017, p. 11.

[24] Leavitt and Fitzgerald 2013, pp. 9-10.

depression and genetic drift, resulting in further reductions of DSL population viability beyond its already endangered status.[25]

DSL are not known to disperse across expanses of unsuitable habitat. Unfortunately, this means DSL populations may have little chance of dispersing across areas where suitable habitat has been removed.[26] Movements of individual DSL between populations are hindered or precluded totally by fragmentation and sadly remain insufficient to sustain DSL demographics necessary to prevent localized extirpations.[27] Over time, fragmentation isolates DSL populations and results in an accelerated decline in populations, until ultimately the species becomes extirpated.[28]

Fragmentation of the shinnery oak ecosystem and DSL habitat has been shown to be irreversible, despite restoration efforts. The science indicates that once shinnery oak dunelands are disturbed, these landforms shift to "alternative stable states" that do not self-regenerate.[29] Trials to restore and recreate shinnery oak dunelands have not been successful. Furthermore, it is "far from certain that artificial dune blowouts could support populations of the species".[30] Successful restoration of shinnery oak dune habitat is unlikely, due to the complexities of the natural processes that form and maintain these landforms, and the difficulty of replicating these processes. Simply put, restoration of shinnery oak vegetation and sand dune-blowout topography is not feasible.[31] All of this amounts to one conclusion, once these DSL ecosystems are developed directly for oil and gas or tangentially harmed by these developments, they are gone forever.

Oil and Gas development is by far and away the largest cause of DSL habitat loss, fragmentation, and modification. Currently, 70 percent of land within the New Mexico range of the DSL has been leased for oil and gas exploration and development. [32] Seventy-one percent of the mineral rights within the range of the DSL in New Mexico are federally owned and fall under BLM lease stipulations and the Pecos District (New Mexico) Special Status Species Resource

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[25] **Exhibit 241,** Hokit, D.G., and L.C. Branch. 2003. *Habitat Patch Size Affects Demographics of the Florida Scrub Lizard (Sceloporus woodi).* Journal of Herpetology 37 (2): 257-265, p. 263 [hereinafter Hokit and Branch 2003]; **Exhibit 242,** Chan, L., L. Fitzgerald, and K. Zamudio. 2009. *The Scale of Genetic Differentiation in the Dunes Sagebrush-Lizard, an Endemic Habitat Specialist.* Conservation Genetics 10:131-142, p. 140 [hereinafter Chan et al. 2009].

[26] Fitzgerald et al. 1997, p. 27.

[27] Leavitt and Fitzgerald 2013, p. 11; **Exhibit 243,** Ryberg, W., M. Hill, C. Painter, and L. Fitzgerald. 2013. *Landscape Pattern Determines Neighborhood Size and Structure within a Lizard Population.* PLOS ONE: 8(2), p. 4 [hereinafter Ryberg et al. 2013]; Walkup et al. 2017, p. 12; **Exhibit 244,** Young, M.E., W.A. Ryberg, L.A. Fitzgerald, and T.J. Hibbitts. 2018. *Fragmentation alters home range and movements of the Dunes Sagebrush Lizard.* Canadian Journal of Zoology 96: 905-912, p. 910 [hereinafter Young et al. 2018].

[28] Leavitt and Fitzgerald 2013, p. 12.

[29] **Exhibit 245,** Ryberg, W., M. Hill, C. Painter, and L. Fitzgerald. 2015. *Linking irreplaceable landforms in a self-organizing landscape to sensitivity of population vital Rates for an Ecological Specialist.* Conservation Biology 29 (3): 888-898, p. 896 [hereinafter Ryberg et al. 2015].

[30] *Id.*

[31] **Exhibit 246,** Johnson, K., M. Horner, E. Muldavin, P. Neville, T. Neville, and J. Smith. 2016. *Dunes sagebrush lizard habitat map and models, New Mexico.* Natural Heritage New Mexico Publ. No. 15-387. Natural Heritage New Mexico, University of New Mexico, Albuquerque, NM, p. 34 [hereinafter Johnson et al. 2016].

[32] 2024 DSL SSA at 58–59.

Management Plan Amendment (RMPA).[33] Oil and Gas development harms to habitat can be further delineated into well pad density, roads, pipelines, and harms affiliated with frac sand mining.

Fragmentation of DSL habitat and the consequential subdivision of populations into smaller, more vulnerable groups is attributed to high densities of oil and gas well pads on the landscape. Several studies have demonstrated a negative relationship between well pad density and the number of DSL present at a site.[34] One such study, Sias and Snell 1998, used a regression analysis to predict a 25 percent reduction in the abundance of DSL at densities of 13.64 wells pads/mi^2.[35] At a density of 29.82 well pads/mi^2, reductions of 50 percent were predicted.[36] Based on this study, Painter et al. (1999, p. 3) recommended that densities in New Mexico be limited to 13 well pads/mi^2.[37] Leavitt and Fitzgerald 2013 also found that areas with 13 well pads/mi^2 or greater had considerably lower abundance of DSL than non-fragmented sites.[38] They also found that high well and road density at the landscape scale resulted in smaller, fewer, and more dispersed sand dune blowouts, further harming DSL persistence.[39] Walkup et al. 2017 further confirmed that DSL populations had a high susceptibility to local extinction in landscapes with 13 or more well pads/mi^2.[40] They concluded that the network-like development of well pads and their connecting roads both isolate populations and disrupt the underlying geomorphologic processes that maintain the shinnery oak dune blowout formations. Johnson et al. 2016 found a marked decline in DSL occurrence at well densities of 5 and 8 well pads/mi^2 with no lizards found at well densities above 23 well pads/mi^2.[41] They suggested that 13 well pads/mi^2 should be considered "degraded" habitat as a standard in the scientific literature.[42] The collective science has clearly found that increases in well density directly harm DSL. BLM must conduct a hard look at the oil well density surrounding each parcel proposed within DSL habitat. Density calculations must be explicit, following the same measurement methodology these studies utilized, and the expected impacts must be assessed accordingly. This analysis will also play a large role for ESA take calculations, as any oil and gas development on DSL habitat should be considered a take.

Oil and gas development, results in caliche roads constructed in a grid-like network.[43] Roads fragment habitat and impede DSL movement, reducing access to habitat, mates, and prey, decreasing population size and population persistence. Roads create fugitive road dust that can blow and land on the surrounding dunelands, changing the composition of the top layer of sand.

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[33] *Id.*
[34] **Exhibit 247,** Sias, D.S., and H.L. Snell. 1998. *The Sand Dune Lizard Sceloporus arenicolus and Oil and Gas Development in Southeastern New Mexico.* Final Report of field studies 1995-1997. Report to New Mexico Department of Game and Fish, p. 1 [hereinafter Sias and Snell 1998]; Leavitt and Fitzgerald 2013, p. 9; Ryberg et al. 2015, p. 893; Johnson et al. 2016, p. 41; Walkup et al. 2017, p. 9.
[35] Sias and Snell 1998, p. 23.
[36] *Id.*
[37] Painter et al. 1999, p. 3.
[38] Leavitt and Fitzgerald 2013, p. 9.
[39] *Id.*
[40] Walkup et al. 2017, p. 10.
[41] Johnson et al. 2016, p. 41.
[42] *Id.*
[43] Young et al. 2018, p. 6.

Studies show that DSL avoid roads and they are a major source of fragmentation.[44] In experimental trials, scientists found that approximately 20 percent of DSL crossed a road bisecting their enclosure.[45] In another study, Young et al. 2018 reported that among DSL specimen with attached radio transmitters, only 1 of 799 documented movements involved the crossing of a road.[46] The one instance of crossing occurred where sand had blown over to cover the caliche road. There have been rare observations of DSL basking on caliche roads, but otherwise roads are recognized as a barrier to movement.[47] When road crossings do occur, the lizards are directly at risk from vehicle strikes, resulting in fatality.[48]

While none of these parcels include the potential for pipeline construction, it should be noted that any further oil and gas development on virgin DSL habitat incentivizes and sometimes results in the need for further pipeline infrastructure. Harms to the species from pipelines include: (1) the staging and storage of equipment, materials, and vehicles; (2) clearing of right-of-ways; (3) trenching for the pipeline; and (4) constructing appurtenant facilities such as "pigging" stations, and compression and pumping stations. 2024 DSL SSA at 62. Since construction does not occur in a vacuum these projects also require access roads, parking lots, and fencing. Such activities remove vegetation and can destabilize the overall dune structure.[49] Heavy equipment used to remove shinnery oak and bury the lines in the sand can cause direct mortality. The large open trenches can form linear pitfall traps for DSL, unable to escape the trench.[50] Ongoing pipeline maintenance crews sometimes travel by off-highway vehicles (OHV), directly and indirectly contributing to DSL habitat decline. Beyond OHV strikes, OHV use may result in soil compaction, reduced plant cover, and tire ruts that exacerbate erosional processes in the dune complexes, further degrading habitat.[51] The cumulative impacts from vehicle infrastructure more generally is immense in scope and scale.

Much of Oil and Gas drilling within this area of New Mexico involves hydrofracturing. Frac sand is a naturally occurring sand used as a proppant during hydraulic fracturing of oil and gas wells to maximize production of unconventional reservoirs. [52] Frac sand mining has occurred

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[44] **Exhibit 248,** Hibbitts, T., L. Fitzgerald, D. Walkup, and W. Ryberg. 2017. *Why Didn't the Lizard Cross the Road? Dunes Sagebrush Lizards Exhibit Road-avoidance Behavior.* Wildlife Research 44 (3): 194-199, p. 197 [hereinafter Hibbitts et al. 2017].

[45] *Id.*

[46] Young et al. 2018, p. 910.

[47] Johnson et al. 2016, p. 11.

[48] **Exhibit 249,** Delgado-Garcia, J.D., J.R. Arevalo, and J.M. Fernandez-Palacios. 2007. *Road Edge Effect on the Abundance of the Lizard Gallotia galloti (Sauria: Lacertidae) in two Canary Islands Forests.* Biodiversity and Conservation 16: 2949-2963, p. 2950 [hereinafter Delgado-Garcia et al. 2007]; **Exhibit 250,** Goncalves, L., D. Alvares, F. Teixeira, G. Schuck, I. Coelho, I. Esperandio, J. Anza, J. Beduschi, V. Bastazini, and A. Kindel. 2018. Reptile Road-kills in Southern Brazil: Composition, Hot Moments and Hotspots. Science of the Total Environment 615: 1438-1445, p. 1441 [hereinafter Goncalves et al. 2018].

[49] **Exhibit 251,** Van Pelt, W.E., S. Kyle, J. Pitman, D. Klute, G. Beauprez, D. Schoeling, and A. Janus. 2013. *The Lesser Prairie-chicken Range-wide Conservation Plan.* 373 pp, p. 37 [hereinafter Van Pelt et al. 2013].

[50] **Exhibit 252,** Romano, A., D. Leavitt, C. Schalk, D. Dittmer, and L. Fitzgerald. 2014. *Vertebrate by-catch of Pipeline Trenches in the Mescalero-Monahans Shinnery Sands of Southeastern New Mexico.* p.95, p. 95 [hereinafter Romano et al. 2014].

[51] Van Pelt et al. 2013, p. 29.

[52] **Exhibit 253,** Mossa, J., and L.A. James. 2013. *Changing Fluvial Systems.* Physical Geography 34(4-5): 267-272, pp [hereinafter Mossa and James 2013]; **Exhibit 254,** Benson, M.E., and Wilson, A.B., 2015, *Frac sand in the*

within Texas portions of DSL habitat including the Southernmost unit of the Southern Mescalero population and the entire Monahans population.[53] The harms of frac sand mining to DSL habitat are substantial. [54] While none of the parcels for this leasing proposal include frac sand mining on DSL habitat, the oil and gas development will likely incorporate hydrofracturing processes that utilize frac sand. Any oil and gas development within DSL habitat not only contributes to the direct impacts upon that specified area of habitat, but will also contribute to further DSL habitat degradation elsewhere through its links to frac sand mines. BLM must include frac sand mining impacts to its hard look and ESA consultation processes.

2. Pollution and Contamination From Oil and Gas.

Oil and gas activities release pollutants into DSL ecosystems including hydrogen sulfide, oil spills, and tebuthiuron.[55] Hydrogen sulfide is a naturally occurring gas generated through oil and gas extraction and storage.[56] Since hydrogen sulfide is heavier than air, DSL are likely more prone to gas poisoning because of their association with the bottoms of dune valleys.[57] One study estimated that DSL could display adverse effects from hydrogen sulfide at concentrations greater than 14 ppm.[58] Site testing of oil and gas infrastructure and surrounding area in New Mexico have found sites with concentrations that reach this level.[59] The Service acknowledges that more research must be done including further site testing.[60] This is yet another contributing harm to the DSL population that must be taken into account when analyzing environmental impacts.

Regarding oil spills, studies of other lizard species have shown that carcinogenic polycyclic aromatic hydrocarbons, a group of chemicals formed during incomplete burning of oil and gas, can accumulate in lizards and the ants they consume.[61] The accumulation of pollutants

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United States—A geological and industry overview: U.S. Geological Survey Open-File Report 2015–1107, 78 p, pp. 1-50 [hereinafter Benson and Wilson 2015]; **Exhibit 255,** Engel, M., F. Boesl, and H. Bruckner. 2018. Migration of Barchan Dunes in Qatar-Controls of the Shamal, Telconnections, Sea-Level Changes and Human Impact. Geosciences 8 (240): 1-16, pp. 1-13 [hereinafter Engel et al. 2018]; Forstner, M.J. D. Neuharth, M. Kiehne, D. Foley III, T. Hardy, J. Jensen. 2018. West Texas Frac-sands Threat Analysis to the Dune Sagebrush Lizard (Sceloporus arenicolus). Report Prepared for Comptroller of Public Accounts State of Texas. 30 pp, pp. 1-19 [hereinafter Forstner et al. 2018]; **Exhibit 257,** Mace, R. 2019. *Frac Sand Facilities and their Potential Effects on the Groundwater Resources of the Monahans-Mescalero Sand Ecosystem Permian Basin, Texas. A Report for the TX Comptroller of Public Accounts Contract* CMD No. 19-6754CS [Mace 2019].

[53] 2024 DSL SSA at 64.

[54] *Id.* at 62–65.

[55] 2024 DSL SSA at 72.

[56] **Exhibit 258,** Brenneman, K.A., R.A. James, E.A. Gross, and D.C. Dorman. 2000. *Olfactory Neuron Loss in Adult Male CD Rats Following Subchronic Inhalation Exposure to Hydrogen Sulfide.* Toxicologic Pathology 28 (2): 326-333, p. 326 [hereinafter Brenneman et al. 2000].

[57] Sias and Snell 1998, p. 23.

[58] **Exhibit 259,** Lusk, J., and E. Kraft. 2010. *Hydrogen Sulfide Monitoring Near Oil and Gas Production Facilities in Southeastern New Mexico and Potential Effects of Hydrogen Sulfide to Migratory Birds and other Wildlife. U.S. Fish and Wildlife Service Environmental Contaminants Program* Project ID: FFS 2F41-200220006.1. 92 pp, p. 15 [hereinafter Lusk and Kraft 2010].

[59] Lusk and Kraft 2010, pp. 7, 12, 33, 34, 36, 61.

[60] 2024 DSL SSA at 72–73.

[61] **Exhibit 260,** Al-Hashem, M.A., P.F. Brain, and S.A. Omar. 2007. *Effects of Oil Pollution at Kuwait's great Al-Burgan Oil Field on Polycyclic Aromatic Hydrocarbon Concentrations in the Tissues of the Desert Lizard Acanthodactylus scutellatus and their Ant Prey.* Ecotoxicology 16: 551-555, pp. 552, 554-555 [hereinafter Al-Hashem et al. 2007].

in lizards can cause severe organ abnormalities and diseases.[62] Oil pollution can also cause behavioral effects since it can darken substrate causing lizards to emerge earlier due to faster substrate warming.[63] Exposure to oil pollution has long lasting, chronic effects on wildlife.[64] Since DSL have a limited, heavily disturbed range, an oil spill could disproportionately degrade more habitat and restrict the range further, compared to spills in other regions. As the Service acknowledges, the probability of a large oil spill increases as oil production and transportation increase. A hard look for oil spill risks to DSL must include an analysis of oil spill data and reports within the region in order to ascertain the propensity for future impacts.

Further pollution from oil and gas activities previously included the spraying of tebuthiuron. Leasee's should be asked whether that practice is expected within any of these parcels. If so, the environmental impacts from spraying tebuthiuron must be fully analyzed including harms to DSL.[65] Other major chemicals, and waste water spills also occur throughout this region. Again, a hard look into this subject matter must include thorough investigations into spill data, including via transportation, in order to properly account for the risks to DSL populations.

3. Groundwater Depletion

Within the Mescalero and Monahans Sandhills, the water table is relatively shallow, with depths ranging from a meter below the surface to approximately 15 to 23 m (50-75 ft) below ground.[66] Water needs throughout the Pecos River Valley are fulfilled primarily via extraction of water from the Pecos Valley and Dockum Aquifers, resulting in multifaceted demands upon the water table. Production of oil and gas is heavily dependent on groundwater.[67] Additionally frac sand mines have recently become established throughout the region and extract water from both

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[62] **Exhibit 261,** Al-Hashem, M.A. 2011. *Evidence of Hepatotoxicity in the Sand Lizard Acnthodactylus scutellatus from Kuwait's Greater Al-Burgan Oil Field.* Ecotoxicology and Environmental Safety 74: 1391-1395, p. 1394-1395 [hereinafter Al-Hashem 2011].

[63] Al-Hashem et al. 2007, p. 592.

[64] Al-Hashem 2011, p. 1395; **Exhibit 262,** Esler, D., B. Ballachey, C. Matkin, D. Cushing, R. Kaler, J. Bodkin, D. Monson, G. Esslinger, K. Kloecker. 2018. *Timelines and mechanisms of wildlife population recovery following the Exxon Valdez oil spill.* Deep Sea Research Part II: Topical Studies in Oceanography 147: 36-42, p. 41 [hereinafter Esler et al. 2018]; **Exhibit 263,** Rosell-Mele, A., N. Moraleda-Cibrian, M. Cartro-Sabate, F. Colomer-Venturay, P. Mayor, M. Orta-Martinez. 2018. *Oil Pollution in Soils and Sediments from the Northern Peruvian Amazon.* Science of the Total Environment 610-611:1010-1019, p. 1017 [hereinafter Rosell-Mele et al. 2018].

[65] **Exhibit 264,** Emmerich, W. 1985. *Tebuthiron – Environmental Concerns.* Rangelands 7 (1):14-16, p. 15 [hereinafter Emmerich 1985].

[66] **Exhibit 265,** Shafer, G. 1956. *Ground-water Resources of the Crane Sandhills, Crane County, Texas.* Bulletin 5604. Texas Board of Water Engineers [hereinafter Shafer 1956]; **Exhibit 266,** Garza, S. and J. Wesselman. 1959. *Geology and Ground-water Resources of Winkler County, Texas.* Bulletin 5916. Texas Board of Water Engineers. 221 pp, p. 13 [hereinafter Garza and Wesselman 1959]; **Exhibit 267,** White, D.E. 1971. *Water Resources of Ward County, TX.* Report 125. Texas Water Development Board. 124 pp, p. 17 [hereinafter White 1971]; **Exhibit 268,** Jones, I.C. 2008. *Investigating Recharge in Arid Alluvial Basin Aquifers: The Pecos River Valley Aquifer, TX.* Gulf Coast Association of Geological Societies Transactions 58: 489-500, p. 489 [Jones 2008]; Mace 2019, p. 12; **Exhibit 269** Rainwater, K. 2020. *Sand Mining Water Use in West Texas.* Environmental Consultant Report, p. 18 [hereinafter Rainwater 2020].

[67] **Exhibit 270,** Ashworth, J. 1990. *Evaluation of Ground-Water Resources in Parts of Loving, Pecos, Reeves, Ward, and Winkler Counties, TX.* Texas Water Development Board Report 317, pp. v, 3 [hereinafter Ashworth 1990]; **Exhibit 271,** Scanlon, B., S. Ikonnikova, Q. Yang, and R. Reedy. 2020. *Will Water Issues Constrain Oil and Gas Production in the United States.* Environ. Sci. Technol.54: 3510-3519 [hereinafter Scanlon et al. 2020].

the Pecos Valley and Dockum Aquifers.[68] This again leads to the double hit of impacts on the parcel being leased within DSL habitat for oil and gas as well as DSL habitat degraded from frac sand mining activities used in the hydrofracturing of the first leased parcel in question. In areas where sand mine operations are underway, mining-related ground water consumption may meet, or exceed, the consumption of all other water users combined.[69]

Shinnery oaks are phreatophytes which means they draw their water supply from near the water table. Shinnery oak taproots often go as deep as 30 ft (9.1m).[70] In some cases, the shinnery oak taproot can directly reach the aquifer. In other cases, if an aquifer is connected to the local water table, then pumping can lower the water table and its capillary fringe, reducing its contribution to intradunal soil water, a.k.a. water occurring between dunes. This can destabilize sand dunes by reducing sand grain cohesiveness, making dunes susceptible to wind erosion and deflation, degrading DSL habitat.[71] Groundwater pumping can also reduce blowout stability and cohesion, again degrading DSL supportive habitat.[72]

Groundwater depletion can stress phreatophytes through reduced photosynthesis and growth, which can lead to their deterioration and death.[73] As water table depths sink deeper, phreatophytes become scattered, weakened, and gradually diminish in size until they cease to exist altogether due to a reduction in the ability of plants to obtain water necessary for normal growth and survival.[74] Reduced growth rates can hinder plant growth, sand accumulation, and dune formation.[75] Death or deterioration of dune-anchoring phreatophytes, including shinnery oak, leads to the erosion and deflation of dune landforms by strong winds.[76] Again, once these DSL ecosystems are destroyed, they are gone, since restoration attempts have failed.

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[68] Mace 2019, pp. 46-48, 57-59; Rainwater 2020, p. 13, Table 2.
[69] Mace 2019, pp. 2, 57-59.
[70] **Exhibit 271,** Gucker, C.L. 2006. *Quercus havardii. In: Fire Effects Information System*, p. 6 [Online]. U.S. Department of Agriculture, Forest Service, Rocky Mountain Research Station, Fire Sciences Laboratory (Producer). Available: https://www.fs.fed.us/database/feis/plants/shrub/quehar/all.html [2019, December 31] [hereinafter Gucker 2006], Peterson and Boyd 1998, p. 5.
[71] Machenberg, 1984, pp. 6, 30-31, **Exhibit 272,** Kocurek, G., and K.G. Havholm. 1993. *Eolian Sequence Stratigraphy-A Conceptual Framework.* Chapter 16 In: Siliciclastic sequence stratigraphy (P. Weimer and H.W. Posamentier, eds.): AAPG Memoir 58, p. 393-409, pp. 394, 398-400, 402-404 [hereinafter Kocurek and Havholm 1993]; **Exhibit 273,** Pye, K. 2009. *Chapter 9: Management and Human Use of Sand Dune Environments.* In: Aeolian Sand and Sand Dunes. P. 329-367, p. 364 [hereinafter Pye 2009]; **Exhibit 273A,** Newton, B.T., and B. Allen. 2014. *Hydrologic Investigation at White Sands National Monument.* New Mexico Bureau of Geology and Mineral Resources. Open-file Report 559, pp. 1, 4, 28 [hereinafter Newton and Allen 2014].
[72] Machenberg, 1984, pp. 6, 24, 30-31.
[73] Machenberg, 1984, pp. 6, 24, 30-31, Stromberg et al. 1992, pp. 45-46, 51, 53, 54-56; Stromberg et al. 1993, pp. 311-112; Laity 2003, pp. 196-197, 208-209, 212, 218.
[74] Robinson 1958, p. 22.
[75] Machenberg 1984, p. 16; Gucker 2006, entire; **Exhibit 274,** University of California Riverside, Center for Conservation Biology. 2018. Proposed Protocol for Measuring Mesquite Health with Respect to Putative Facors Causing Declines in Stand Health in the Coachella Valley. Report Prepared for the Coachella Valley Conservation Commission [hereinafter University of California Riverside 2018].
[76] Machenberg, 1984, pp. 6, 19-21, 24, 29-31, 33; Kocurek and Havholm 1993, pp. 394, 401-402; **Exhibit 275,** Muhs, D., and V. Holliday. 2001. *Origin of Late Quaternary Dune Fields on the Southern High Plains of Texas and New Mexico*. GSA Bulletin 113 (1): 75-87, pp. 75-76 [hereinafter Muhs and Holliday 2001]; **Exhibit 276,** Laity, J. 2003. *Aeolian Destabilization Along the Mojave River, Mojave Desert, California: Linkages Among Flucial, Groundwater, and Aeolian Systems.* Physical Geology 24 (3): 196-221, pp. 196-197, 216-217 [hereinafter Laity 2003].

Groundwater depletion can also prevent young plants from becoming established further precluding dune formation.[77] Reduced recruitment of young plants into phreatophyte populations can lead to vegetation declines over time, and thus DSL duneland habitat disappearance.[78] The Service concludes, "The consequences of shinnery oak death and degradation from groundwater pumping effects are significant because shinnery oak cannot be readily replaced."[79] Ultimately oil and gas activities as well as frac sand mining activities, lower the water table underlying a dune field which in turn depletes soil moisture; reduces the cohesiveness of sand grains; leaves dune plants susceptible to water stress, desiccation, and death; and causes wind erosion and deflation of the dune landforms. The Service predicts that over time, "there will likely be further stress to aquifers and groundwater levels due to changes in precipitation patterns and increasing summer temperatures."[80]

Effects of lowering the water table extend directly to the DSL, beyond impacts to its shinnery oak habitat. Female DSL prefer sandy soils with relatively high moisture content for nesting. DSL dig burrows into the base of sand dunes or within dune blowouts; construct nest chambers at the soil moisture horizon; and pack eggs with moist sand.[81] Evidently, the direct impacts to DSL due to groundwater depletion, surround reproduction behaviors and preferences for the species. Reproduction hinderances are particularly harmful for DSL existence moving forward and must be heavily considered, in depth, if an adequate NEPA and ESA consultation process is to occur. Again, leasees should be expected to disclose where it sources its water and frac sand in order to inform BLM of the multiple locations in which detrimental impacts to DSL habitat are occurring.

4. Direct Mortality

Direct mortality to individual DSL can occur from vehicle strikes on roads, OHV strikes within DSL habitat, and heavy equipment use for construction of roads, pipelines, well pads, renewable energy infrastructure, and sand mining.[82] These direct mortality threats are included within the above comments, but an additional source is predation. Loggerhead shrikes are birds that prey upon DSL. These birds use fences, poles, trees, and utility wires as perches from which to hunt.[83] There are scientific hypotheses asserting that areas with more artificial perches stemming from oil and gas infrastructure, utility wires and poles, and fencing results in increased predation by bird species, particularly in habitats that were treeless and open prior to human

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[77] Laity 2003, pp. 196, 209-211; **Exhibit 277,** Cambell, J.E., M.R. Sharifi, and P.W. Rundel. 2017. *Impact of Ground Water Depletion on the Mesquite Community at Edwards Air Force Base, Western Mojave Desert, California.* Aliso 35(2): 69-77, p. 77 [hereinafter Cambell et al. 2017].
[78] Laity 2003, pp. 196, 209-211; Cambell et al. 2017, pp. 69, 76-77.
[79] 2024 DSL SSA at 80–81 (citing Gucker 2006, entire; Peterson and Boyd 1998, pp. 1, 10.).
[80] 2024 DSL SSA at 81.
[81] **Exhibit 278,** Ryberg, W.A, M.T. Hill, D. Lay, and L.A. Fitzgerald. 2012. *Observations on the Nesting Ecology and Early Life History of the Dunes Sagebrush Lizard.* Western North American Naturalist 72(4): 582-585, pp. 583-584 [Ryberg et al. 2012].
[82] 2024 DSL SSA at 82.
[83] **Exhibit 278,** Ryberg, W.A, M.T. Hill, D. Lay, and L.A. Fitzgerald. 2012. *Observations on the Nesting Ecology and Early Life History of the Dunes Sagebrush Lizard.* Western North American Naturalist 72(4): 582-585; **Exhibit 279,** Rappole, J. 2000. Birds of the Southwest: Arizona, New Mexico, Southern California, and Southern Nevada, p. 163 [Rappole 2000]; Hathcock and Hill 2018, pp. 222-223.

interventions.[84] A study in New Mexico documented over 50 percent of loggerhead shrike hunts were initiated from a power line.[85] Ultimately, DSL habitats that had few to no perches, and thus notably less threats to the DSL from bird predation, can be transformed into habitats within increased predation up DSL, thus adding another compounding detriment to the species. BLM must take a hard look and what perch-like infrastructure will be included on parcels leased within DSL habitat.

iii. When Taking Hard Look at DSL Impacts, BLM Must Include the Compounding Impacts of Climate Change as Well.

DSL are ectothermic, so ambient temperatures affect their physiological performance and daily activities.[86] Daily DSL activity declines as air and substrate temperatures increase due the necessity to thermoregulate for survival.[87] DSL do possess behavioral and physiological mechanisms to help them avoid extreme temperatures, which would normally limit effects on DSL.[88] Unfortunately, extreme events, including drought, impact shinnery oak habitat DSL depend on for these mitigating behaviors.[89] Climate change is likely altering the frequency and magnitude of these events, the effect of which is further exacerbated by anthropogenic changes to the landscape, especially oil and gas development. The oil and gas activities are further exacerbating the intensity of climate change and thus further contribute to the extinction of DSL, and many other flora and fauna. These ecosystems and their species, including the DSL, are inexorably linked to humanity's survival, well-being, and socio-economic success. The hydrocarbons extracted from these parcels by the oil and gas industry will be released into the atmosphere as greenhouse gases, either before or after combustion, thus further contributing to climate change and thus DSL diminishment into extinction. This socio-economic cost to society must be accounted for within a hard look analysis. BLM is already aware of cost accounting

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[84] **Exhibit 280,** Dinkins, J.B., M.R. Conover, C.P. Kirol, J.L. Beck, and S.N. Frey. 2014. *Greater Sage-Grouse (Centrocercus urophasianus) Hen Survival: Effects of Raptors, Anthropogenic and Landscape Features, and Hen Behavior.* Canadian Journal of Zoology 92: 319-330, p. 320 [hereinafter Dinkins et al. 2014]; **Exhibit 281,** Lammers, W., and M. Collopy. 2007. *Effectiveness of Avian Predator Perch Deterrents on Electric Transmission Lines.* The Journal of Wildlife Management 71 (8):2752-2758, p. 2752 [hereinafter Lammers and Collopy 2007]; **Exhibit 282,** Prather, P., and T. Messmer. 2010. *Raptor and Corvid Response to Power Distribution Line Perch Deterrents in Utah.* Journal of Wildlife Management 74 (4): 796-800, p. 796 [hereinafter Prather and Messmer 2010]; **Exhibit 283,** Slater, S., and J. Smith. 2010. *Effectiveness of Raptor Perch Deterrents on an Electrical Transmission Line in Southwestern Wyoming.* Journal of Wildlife Management 74 (5): 1080-1088, p. 1080 [hereinafter Slater and Smith 2010].

[85] **Exhibit 284,** Hathcock, C.D., and M.T. Hill. 2018. *Loggerhead shrike predation on dune-dwelling lizards and nesting success in southeastern New Mexico.* The Southwestern Naturalist 63: 220-224 [Hathcock and Hill 2018].

[86] Sartorius et al. 2002, p. 1996.

[87] Sartorius et al. 2002, p. 1975; **Exhibit 285,** Fitzgerald, L.A., Painter, C.W., T.J. Hibbitts, W.A. Ryberg, and N. Smolensky. 2011. *The Range and Distribution of Sceloporus arenicolus in Texas: Results of Surveys Conducted 8-15 June 2011: Final Report.* Texas A&M University, p. 4 [hereinafter Fitzgerald et al. 2011].

[88] **Exhibit 286,** Smolensky, N., and L. Fitzgerald. 2010. *Distance Sampling Underestimates Population Densities of Dune-Dwelling Lizards.* Journal of Herpetology 44 (3): 372-381, p. 374 [hereinafter Smolensky and Fitzgerald 2010]; **Exhibit 287,** Jacobson, C. 2016. *Thermal Ecology of the Dune Sagebrush Lizard.* Texas A & M University. Undergraduate Research Scholar Thesis. 13 pp, p. 3 [hereinafter Jacobson 2016]; **Exhibit 288,** Leavitt, D. 2019a. *Climatic conditions of the Mescalero-Monahans Shinnery Sands and how they relate to activity patterns of the Dunes Sagebrush Lizard.* Report prepared for Center of Excellence in Hazardous Materials Management, p. 1 [hereinafter Leavitt 2019a].

[89] 2024 DSL SSA 74.

methodology for greenhouse gas emissions. A hard look by BLM, must include the cost to society for the GHG's emitted resulting from leasing these parcels. An omission of this accounting by BLM, would leave a glaring gap in NEPA and ESA analyses for an ever-growing contribution to the DSL's demise.

Extreme cold and winter storms impact DSL. In order for DSL to be active they must hold a body temperature above 23°C (73°F).[90] Extreme cold weather snaps, sometimes accompanied by snow and hail, can reduce physiological activity resulting in DSL deaths. Ice storms can also result in destruction of shinnery oak. Dispersal and source-sink dynamics have traditionally allowed DSL to weather extreme winter storms.[91] Unfortunately, habitat fragmentation, by restricting patch size and dispersal ability, may create isolated populations vulnerable to sudden loss of habitat due to extreme winter storm events. The threats to DSL posed by extreme cold and winter storm events, will only grow as anthropogenic climate change continues to gain momentum and fragmentation of DSL habitat grows. A hard look on these negative influences must include the compounding effects of these exponential threats.

On the other side of the coin, extreme heat and drought harms DSL populations as well. Granted, DSL is adapted to reside in a semiarid climate with a history of extreme heat and drought. But, over the last 20 years, southeastern New Mexico has frequently been in drought conditions, facing periods of severe drought.[92] In the 1920s and 1930s, shinnery oak ecosystems on average encountered drought 1 to 2 years in northern portions and 2 to 3 years in southern portions out of every 10 years.[93] In the past 20 years, moderate to exceptional drought has occurred every 1 to 2 years in the southern and northern shinnery oak ecosystems.[94] Drought is becoming more extreme in degree, and in some cases more frequent.

While no direct study has been conducted on drought impacts to DSL, the Service surmises that Drought could impact food resources, which would then impact DSL productivity. Relatedly, the marbled whiptail (*Aspidoscelis marmoratus*), another lizard species found in the Monahans Sandhills, showed decline in density during drought.[95] If drought restricts available food resources, it could negatively affect DSL recruitment and survival.

Shinnery oak can lose its leaves or not even leaf-out during periods of drought.[96] "Recent droughts have resulted in a lack of the typical spring green-up for shinnery oak, instead occurring later with the seasonal summer monsoons".[97] Green-up timing is critical to DSL, providing shelter for adults as they become active in the spring as well as food for invertebrates consumed by DSL. Drought impacts on shinnery oak hold broader consequences for duneland habitat as well. Shinnery oak clones can reach 50 ft in diameter, making large areas of duneland habitat vulnerable should an oak demise due to drought impacts.[98]

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[90] Johnson et al. 2016, p. 3.
[91] 2024 DSL SSA at 74.
[92] U.S. Drought Monitor, https://droughtmonitor.unl.edu/.
[93] Peterson and Boyd 1998, p. 14.
[94] 2024 DSL SSA at 74–75.
[95] Fitzgerald et al. 2011, p. 30.
[96] Peterson and Boyd 1998, p. 9.
[97] 2024 DSL SSA at 75 (citing Johnson et al. 2016, p. 78.).
[98] Gucker 2006, p. 7.

"Climate change is likely to increase the frequency and magnitude of drought in this region."[99] An increase in drought frequency and intensity is occurring throughout the range of the DSL.[100] Future climate change projections specify groundwater resources will be further depleted with more extreme drought and increasing summer temperatures.[101] Alterations to the landscape via oil and gas development will also exacerbate the impacts of climate change to DSL. Habitat fragmentation can increase air temperatures, increase solar radiation, and reduce the availability of microhabitats available to serve as thermal refugia.[102] Fragmentation also restricts natural source-sink dynamics that could buffer against extreme weather impacts through DSL dispersal behavior. Fragmentation lessons DSL capabilities to disperse and escape harsher micro-habitats harder hit by drought.[103] Given DSL reliance upon shinnery oaks and dunelands, growing drought will undoubtedly harm DSL in growing and compounding ways that BLM must address in its NEPA and ESA consultation processes.

F. BLM Must Take a Hard Look At Impacts of Oil and Gas Leasing and Development on the Endangered Southern DPS of the Lesser Prairie Chicken. BLM Should Defer Parcels Within, and Within 10 Miles of the Southern DPS.

The LPC population in New Mexico is a genetically unique and highly biologically significant population that evolved through specific adaptations to thrive in the Shinnery Oak Prairie ecoregion. Industrial development in New Mexico, particularly oil and gas development livestock grazing, have dramatically decreased the habitat available to the state's LPC population and drastically reduced the population's size— so much so that FWS has listed the Southern LPC DPS as endangered under the Endangered Species Act ("ESA"). Because this population is a habitat specialist population, and cannot easily adapt to new habitats, it is particularly vulnerable to habitat destruction and fragmentation.

BLM administers much of the LPC's remaining habitat. BLM therefore has the power to either help protect the remaining New Mexico LPC population, or to further threaten its survival by permitting leasing of federal lands in critical LPC habitat areas for oil and gas exploration and development. Any use of BLM lands inconsistent with the preservation of current LPC habitat will have a significant and negative impact on the LPC population. Parcels in the proposed oil and gas lease sales are located within or near the range of the endangered southern distinct population segment ("DPS") of the lesser prairie chicken (*Tympanuchus pallidicinctus*) ("LPC").

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[99] 2024 DSL SSA at 76.
[100] **Exhibit 289,** Kinniburgh, F., M. Simonton, and C. Allouch. 2015. *Come Heat and High Water: Climate Risk in the Southeastern U.S. and TX.* A Product of the Risky Business Project, p. 62 [hereinafter Kinniburgh et al. 2015].
[101] **Exhibit 290,** Nielsen-Gammon, J.W., J.L. Banner, B.I. Cook, D.M. Tremaine, C.I. Wong, R.E. Mace, H. Gao, Z.L. Yang, M.F. Gonzalez, R. Hoffpauir, T. Gooch, and K. Kloesel. 2020. *Unprecedented Drought Challenges for Texas Water Resources in a Changing Climate: What Do Researchers and Stakeholders Need to Know?* Earth's Future 8: e2020EF001552, pp. 5-7 [hereinafter Nielsen-Gammon et al. 2020]; **Exhibit 291,** Yoon, J.H., S.-Y. Wang, M.-H. Lo, and W.-Y. Wu. 2018. *Concurrent increases in wet and dry extremes projected in Texas and combined effects on groundwater.* Environmental Research Letters 13: 054002 [hereinafter Yoon et al. 2018].
[102] Jacobson 2016, pp. 3-4, 10.
[103] 2024 DSL SSA at 76.

Leasing this land would create new and exacerbate existing threats to LPC survival, including increases in infrastructure and ensuing habitat fragmentation, noise pollution, and environmental hazards from the oil and gas drilling and extraction itself. The LPC New Mexico population stands on a precipice, and BLM's decision with respect to these federal lands will likely determine the fate of this unique and genetically distinct population. BLM should choose *not* to lease *any* federal land for oil and gas development, and to preserve this unique and biologically significant population.

Given the serious threats already facing the LPC, and the fact that climate change will further exacerbate them, BLM should not open federal lands to lease for oil and gas development. Such activity will inflict significant harm on the LPC population and significantly decrease its ultimate chance of survival and recovery. While the existing threats facing the LPC and those predicted from climate change will be difficult to control, BLM does control the decisions about new land leases in critical habitat areas of the New Mexico LPC. BLM must use its power to avoid further harm to this fragile and genetically unique population.

BLM's past, current, and future decisions with respect to the leasing of LPC habitat will significantly and gravely impact the LPC. BLM's planning area includes 2.1 million acres of Federal surface land, and 3 million acres of BLM-managed mineral estate in New Mexico's Chaves, Eddy, and Lea Counties.[104] These counties are located in southeastern New Mexico and overlap considerably with critical LPC habitat. LPCs currently occupy seven counties within New Mexico—specifically, Eddy, Lea, Chaves, Leah, De Baca, Roosevelt, and Quay counties.[105]

Preserving remaining LPC habitat is critical because the LPC population already faces significant threats to its survival. This section outlines the EA's failure to take a hard look at the most significant threats to the LPC, making preservation by BLM of remaining LPC habitat and population even more crucial. BLM failed to take a hard look at the following threats to LPC that will arise from leasing parcels in and near occupied habitat for LPC, and unoccupied habitat that, critically, may in the future be necessary to ensure the newly-ESA-listed bird's survival and recovery. For these reasons, BLM should defer all parcels within or within 10 miles of the endangered Southern DPS.

BLM's imperative to take a hard look at impacts to habitat necessary for survival, recovery, and potential future introductions are made more important by the uniqueness and fragility of the New Mexico's LPC population, where survival and recovery of this population will almost certainly require not just stopping habitat loss, but also conservation, restoration, and reintroduction of birds into previously occupied habitat. Each population of the LPC is genetically unique, and this is particularly true of the LPC New Mexico population.[106] The LPC population in New Mexico resides in an ecoregion known as the Shinnery Oak Prairie, and

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[104] Bureau of Land Management, *Public Scoping Report for the Carlsbad Field Office Resource Management Plan Revision/Environmental Impact Statement*, 4 (May 2011).
[105] WildEarth Guardians et al., *supra*, at 55.
[106] **Exhibit 138,** Sara Oyler-McCance, *Rangewide Genetic Analysis of Lesser Prairie-Chicken Reveals Population Structure, Range Expansion, and Possible Introgression*, 17 Conservation Genetics 643 (2016).

members within this population exhibit especially unique genetic patterns.[107] In fact, numerous genetic studies comparing LPC populations of New Mexico to the nearest neighboring population in Oklahoma have documented substantial genetic differences between these regions that suggest significant, if not complete, isolation by distance.[108] This isolation has resulted in a number of adaptations that make the population uniquely suited to the conditions of the Shinnery Oak Prairie. For example, studies document that this population invests more in survival and less in reproduction than do LPCs in more northerly regions.[109] The particular adaptations of the New Mexico LPC make this population highly biologically significant, and loss of this specific population of the LPC would mean substantial and irrevocable loss of intra-species biodiversity.

While the LPC has historically occupied habitat in east-central New Mexico, both its population and range and have decreased dramatically in the last two hundred years.[110] Prior to settlement and development, there were an estimated 125,000 LPC in the region.[111] However, since the 1800s, the overall occupied range of the LPC has decreased 92 percent—a figure which incorporates a 78 percent decrease in their range since 1963.[112] This decrease in LPC range is accompanied by a marked decrease in its population numbers. The latest LPC aerial survey indicates an estimated breeding population of about 38,000 birds in New Mexico.[113] There, the LPC currently occupies about 2 million acres, the majority of which are in eastern New Mexico.[114] However, LPCs are concentrated in patches within the few regions in New Mexico they still occupy, and only four of these patches exceed the 17,885-acre threshold necessary to maintain their populations over the long term.[115] What's more, only 26 percent of suitable habitat occupied by the LPC is considered large enough to support the populations.[116]

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[107] **Exhibit 139,** L. McDonald, *Range-Wide Population Size of the Lesser Prairie-Chicken*: *2012, 2013, 2014, 2015, and 2016*. Technical Report for the W. Ass'n of Fish and Wildlife Agencies (2016); Sara Oyler-McCance, *Rangewide Genetic Analysis of Lesser Prairie-Chicken Reveals Population Structure, Range Expansion, and Possible Introgression*, 17 Conservation Genetics 643 (2016), Exhibit 130.

[108] **Exhibit 140,** WildEarth Guardians et al., *Petition to List the LPC (Tympanuchus pallidicinctus) & Three Distinct Population Segments Under the U.S. Endangered Species Act & Emergency Listing Petition for the Shinnery Oak Prairie & Sand Sage Prairie Distinct Population Segments* 9 (Sept. 8, 2016).

[109] **Exhibit 141,** Patten et al., *Effects of Microhabitat and Microclimate Selection on Adult Survivorship of the Lesser Prairie-Chicken,* 69 Journal of Wildlife Mgmt. 1270 (2005). **Exhibit 142,** Grisham et al., *Nesting Ecology and Nest Survival of Lesser Prairie Chickens on the Southern High Plains of Texas*, 78 Journal of Wildlife Management 857 (2014).

[110] **Exhibit 143,** Michael Massey, *Long-Range Plan for the Management of Lesser Prairie Chickens in New Mexico*, Federal Aid in Wildlife Restoration Grant W-104-R41, Project 3.4, 47 (2001).

[111] J.A. Bailey et al., *Status of the Lesser Prairie Chicken in New Mexico*, 32 Prairie National 157 (2000).

[112] **Exhibit 144,** Taylor et. al., *Status, Ecology, and Management of the Lesser Prairie Chicken*, 77 USDA Forest Service Gen. Tech. Rep. 15 (1980a).

[113] *Aerial Survey Confirm Upward Trend in Lesser Prairie-Chicken Population* (07/08/2018), Gov't website https://www.wafwa.org/news/e_2104/Lesser_Prairie_Chicken_News_Releases/2018/7/Aerial_Surveys_Confirm_Upward_Trend_in_Lesser_Prairie-Chicken_Population.htm.

[114] **Exhibit 145,** Walter Van Pelt, *Lesser Prairie-Chicken Range-wide Conservation Plan Annual Progress Report* (2016).

[115] **Exhibit 146,** Kevin Johnson, *GIS Habitat Analysis for Lesser Prairie Chickens in Southeastern New Mexico*, 6 BMC Ecology 18 (2006).

[116] *Id.*

In order to survive and thrive, the LPC requires large tracts of relatively intact native grasslands.[117] According to the U.S. Fish and Wildlife Service ("FWS"), the LPC requires continuous areas of habitat that are at least 25,000 acres and connected to other large areas of habitat.[118] Without large enough tracts of land, and sufficient corridors connecting this land to other large tracts of land, the LPC population is likely to significantly decrease.[119] This is particularly true because LPC are habitat specialists, meaning that they are uniquely adapted to their specific environment.[120] As a result, the decline in LPC population size associated with habitat destruction and fragmentation is greater than the effect of acreage of habitat lost alone.[121]

As a result of its habitat-specific adaptations, it is far more difficult for the LPC to adapt to new environments. Unlike habitat generalist species, in which population decline due to habitat loss is mitigated by the species' ability to adapt to a new habitat, the LPC cannot generally make up for lost habitat by finding and adapting to new land. Thus, LPC populations decline in lockstep with habitat loss.

Having sizeable and reliable habitat is also critically important for the LPC because they regularly return to the same mating sites, called leks. LPC leks are typically short grassy areas or blowouts in flat sandy country.[122] In New Mexico, LPCs tend to select mating areas during spring, with greater cover of shrubs and overall density of vegetation.[123] The species typically has high fidelity to lek sites: males and females often return to the same lek sites year after year, underscoring the importance of consistent and suitable LPC habitat to the continued survival of the species.[124]

i. BLM Needs to Take a Hard Look at Impacts of Habitat Fragmentation

BLM is required to take a hard look at the impacts of habitat fragmentation on LPC. This includes habitat fragmentation that may result from the development oil and gas leasing with wells, powerlines, roads, and other infrastructure within both occupied habitat and habitat that is now unoccupied that may in the future be necessary for lesser prairie-chicken survival and recovery. BLM sidesteps analysis by claiming that leasing parcels are at least 10 miles away from estimated occupied habitat; the EA lacks monitoring or other data to demonstrate that

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[117] *Natural Resources Conservation Services New Mexico Lesser Prairie Chicken Initiative* (last visited October 18, 2018), Gov't website. https://www.nrcs.usda.gov/wps/portal/nrcs/detail/nm/programs/financial/eqip/?cid=nrcs144p2_068635.
[118] WildEarth Guardians et al. at 20.
[119] **Exhibit 147,** Bender et al., *Habitat loss and Population Decline: A Meta-Analysis of the Patch Size Effect, 79* Ecology 517 (1998).
[120] *Id.*
[121] *Id.*
[122] **Exhibit 148,** Farrell Copelin, *Notes Regarding the History and Current Status of the Lesser Prairie Chicken in Oklahoma*, 37 Proc. Okla. Acad. Sci. 158 (1959).
[123] **Exhibit 149,** Lena Larsson et al., *Fine-Scale Selection of Habitat by the Lesser Prairie-Chicken*, 58 Southwest Nat. 135 (2013).
[124] **Exhibit 150,** D.A. Haukos et al., *Lesser Prairie Chicken Nest Site Selection and Vegetation Characteristics in Tebuthiuron Treated and Untreated and Untreated Sand Shinnery Oak in Texas.* 49 Great Basin Naturalist 624 (1989). Lesser Prairie-Chicken Interstate Working Group, *The Lesser Prairie-Chicken Range-Wide Conservation Plan* 14 (Oct. 2013).

parcels are or are not occupied by lesser prairie-chicken; it lacks such data to demonstrate that parcels are not sufficiently close to occupied habitat to ensure against habitat fragmentation impacts; it lacks analysis sufficient to ensure that habitat fragmentation resulting from development of leased parcels will not compromise unoccupied habitat within the Southern DPS that may be necessary for future reintroductions or to otherwise ensure for the lesser prairie-chicken survival and recovery.

Habitat fragmentation -- discontinuity in the spatial distribution of resources and conditions that affects occupancy, reproduction, or survival of a particular species -- poses the greatest threat to the survival of the LPC,[125] because it creates or exacerbates several significant threats to the LPC population.

According to FWS, "[t]he loss and fragmentation of even relatively small amounts of existing and suitable habitat can easily put the [LPC] on a path towards a 'death spiral' from which it cannot recover, as [FWS] has seen for similar prairie grouse species such as the now-extinct heath hen and endangered Attwater's prairie-chicken."[126] Habitat specialists like the lesser prairie chicken require larger habitat patch sizes to survive in the long term; decline in population size associated with habitat fragmentation will almost certainly be greater than the effect of acreage of habitat lost alone.[127]

Habitat fragmentation increases the probability of LPC population extirpations. Without effective channels of connection between suitable pockets of LPC habitat, isolated LPC population are prevented from inter-breeding.[128] Thus, habitat fragmentation leads to the biological impoverishment of resulting fragments of habitat.[129] The population as a whole will diminish in genetic diversity, ultimately lowering the species' ability to withstand natural disease or predation. In addition, habitat fragmentation can result in a population increase in harmful species, such as predators, in the space between suitable LPC habitats; these harmful species can then detrimentally affect the LPC in the remaining pockets of suitable habitat.[130]

The effects of habitat fragmentation, including a diminished genetic pool, a decrease in the number suitably sized habitat patches, and an increase in natural predation, extend beyond the isolated pockets of the population in habitat patches and produce long-term consequences for the entire species.

Relatedly, the LPC is considered an "umbrella species": a species that requires a sufficiently large and un-fragmented native habitat such that conservation of that species

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[125] T.L. Fields, *Breeding season habitat use of Conservation Reserve Program (CRP) land by lesser prairie-chickens in west-central Kansas* (2004) (unpublished M.S. thesis, Colorado State University).
[126] (Defendant's Additional Filing in Support of their Opposed Motion to Amend the Judgment, Case No. 7:14-CV-00050-RAJ at 7; LPC Petition 53).
[127] Darren J. Bender, Thomas A. Contreras, and Lenore Fahrig, *Habitat loss and population decline: a meta-analysis of the patch size effect*, 79 Ecology. 517 (1998), Exhibit 138.
[128] **Exhibit 151,** L. Fahrig and G. Merriam, *Conservation of fragmented populations*, 8 Conserv. Biol. 50, 54 (1994).
[129] **Exhibit 152,** S. Harrison & E. Bruna, *Habitat fragmentation and large-scale conservation: What do we know for sure?* 22 Ecography 225, 229 (1999).
[130] D.S. Wilcove, C.H. McLellan, and A.P. Dobson, *Habitat fragmentation in the temperate zone*, in Conservation Biology: The Science of Scarcity and Diversity 237, 248 (M.E. Soulé, ed., 1986).

effectively provides for the conservation of several other sensitive species.[131] Protecting the LPC population by providing millions of hectares of contiguous prairie serves as both an effective way to promote LPC survival in the wild, and a way of protecting the whole ecosystem of the region. Conversely, loss of habitat suitable for the LPC will not only affect that species, but will produce far-reaching consequences for the region.[132]

Habitat fragmentation can be caused by human activities such as construction of roads and powerlines, energy development, cropland cultivation, and urban or rural sprawl.[133] Habitat fragmentation can result in both displacement of populations from preferred habitats, and significant stress to individuals that remain in close proximity. By failing to buttress its estimates of occupied and unoccupied habitat with actual lesser prairie-chicken location monitoring data, the EA charges forward with leasing parcels without understanding in fact where or how the bird's may be impacted.

For example, a decrease in large patches of un-fragmented habitats, and a commensurate increase in human infrastructure, leads to habitat fragmentation and a decline in LPC population much larger than might be apparent from only taking into account what we might normally consider physical barriers to movement.[134] Active leks are only found, in general, at least 3,000 to 5,000 meters away from anthropogenic features like roads, power lines, and oil and gas wells.[135] In general, the LPC avoids power lines, wells, and buildings; therefore, areas with comparatively greater human development have significant habitat fragmentation and lower survival and fecundity rates than less fragmented areas.[136]

Given the current, advanced, level of habitat loss and fragmentation in New Mexico, the further development of prairie for uses such as oil and gas development will severely threaten the future survival of the LPC. In New Mexico, only 26% of suitable habitat occurred in patches large enough to support lesser prairie chickens, whereas 74% of the "suitable" habitat (including most high-quality habitat) was in patches too small to support LPCs.[137] Only four habitat patches in New Mexico exceed the 17,885-acre threshold necessary to maintain lesser prairie chickens over the long term.[138]

1. Habitat Fragmentation Due to Livestock Development

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[131] **Exhibit 153,** C.L. Pruett, M.A. Patten, and D.H. Wolfe, *Avoidance behavior by prairie grouse: Implications for development of wind energy*, 23 Conserv. Biol. 1253, 1254 (2009).
[132] **Exhibit 154,** N.J. Silvy, M.J. Peterson, and R.R. Lopez, *The cause of the decline of the pinnated grouse: The Texas example*, 32 Wildl. Soc. Bull. 16, 20 (2004).
[133] B.A. Grisham, A.J. Godar, and C.P. Griffin, *Climate change*, 48 Stud. Avian Biol. 221, 227 (2016).
[134] **Exhibit 155,** S.D. Fuhlendorf, A.J. Woodward, D.M. Leslie Jr., and J.S. Shackford, *Multi-scale effects of habitat loss and fragmentation on lesser prairie-chicken populations of the US Southern Great Plains*, 17 Landscape Ecol. 617, 626 (2002).
[135] **Exhibit 156,** Anne M. Bartuszegive and Alex Daniels, *Impacts of energy development, anthropogenic structures, and land-use change on lesser prairie-chickens*, 48 Stud. Avian Biol. 205, 212 (2016).
[136] C.A. Hagen, *A demographic analysis of lesser prairie-chicken populations in southwestern Kansas: Survival, population viability, and habitat use*(2003) (unpublished Ph.D. dissertation, Kansas State University).
[137] K. Johnson, T.B. Neville, and P. Neville, *GIS habitat analysis for lesser prairie chickens in southeastern New Mexico*, 6 BMC Ecology (2006), at http://www.biomedcentral.com/1472-6785/6/18.
[138] *Id*.

BLM needs to take a hard look at the how leasing parcels for oil and gas may impact lesser prairie-chicken cumulatively alongside livestock grazing, which also presents a critical risk to the LPC's survival. A habitat characterized by intermittent fire and heavy but infrequent bison grazing is most suitable for the LPC.[139] Human actions such as fire suppression and replacing bison with domestic cattle degrades the habitat for the LPC.[140] Because lesser prairie chickens are dependent on medium to tall grasses in a region of low rainfall, their habitat is very sensitive to overgrazing.[141] The shift from heavy but infrequent grazing by bison to heavy and constant grazing by domestic livestock has contributed to the spread of shrubs and trees, and has reduced the prevalence of native perennial grasses.[142] Therefore, the cultivation of livestock alters the natural composition of the grasslands, making the area increasingly unsuitable to support the LPC.

In New Mexico, livestock overgrazing is the second most important factor in determining cause of lek abandonment, accounting for 18.6% of the observed abandonment.[143] Heavy grazing diminishes the amount of *Andropogon*, a grass associated with good range condition and indicative of active leks. *Andropogon* decreases with grazing pressure, indicating that heavy livestock grazing is a primary contributor of lek abandonment in New Mexico.[144]

Additionally, the infrastructure needed for raising cattle poses a threat to the LPC. A collateral impact of livestock grazing is the proliferation of barbed-wire fences to divide pastures and mark changes in land ownership. Collision with fences was the second-highest cause of mortality for radio-collared lesser prairie chickens in Oklahoma and New Mexico, killing 86 of 322 birds, versus 91 mortalities from raptor predation.[145] In New Mexico, 26.5% of prairie chicken mortalities were the result of fence collisions. *Id.* Although marking fences to reduce grouse collision mortalities may be a way to combat this issue, it is only partially effective, reducing but not eliminating this source of mortality. Ultimately, fence removal is the biologically preferable option.[146]

2. Habitat Fragmentation Due to Roads

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[139] **Exhibit 157,** C.A. Hagen, B.K. Sandercock, J.C. Pitman, R.J. Robel, and R.D, *Spatial variation in lesser prairie-chicken demography: A sensitivity analysis of population dynamics and management alternatives*, 73 J. Wildl. Manage. 1325, 1330 (2009).
[140] *Id*.
[141] **Exhibit 158,** F. Hamerstrom & F. Hamerstrom, *Status and problems of North American grouse*, 73 Wilson Bull. 284, 290 (1961).
[142] M.A. Patten, D.H. Wolfe, E. Shochat, and S.K. Sherrod, *Effects of microhabitat and microclimate selection on adult survivorship of the lesser prairie-chicken*, 69 J. Wildl. Manage. 1270, 1277 (2005), Exhibit 133.
[143] **Exhibit 159,** J.L. Hunt & T.L. Best, *Investigation into the decline of populations of the lesser prairie chicken (Tympanuchus pallidicinctus) on lands administered by the Bureau of Land Management, Carlsbad Field Office, New Mexico*, Final Report to the Bureau of Land Management, Cooperative Agreement GDA010007 (2004).
[144] **Exhibit 160,** J.L. Hunt & T.L. Best, *Vegetative characteristics of active and abandoned leks of lesser prairie-chickens (Tympanuchus pallidicinctus) in southeastern New Mexico*, 55 Southw. Nat. 477, 481 (2010).
[145] **Exhibit 161,** D.H. Wolfe, M.A. Patten, E. Shochat, C.L. Pruett, and S.K. Sherrod, *Causes and patterns of mortality in lesser prairie-chickens Tympanuchus pallidicinctus and implications for management*, 13 Wildl. Biol. 95, 99 (2007).
[146] **Exhibit 162,** D.H. Wolfe, M.A. Patten, and S.K. Sherrod, *Reducing grouse collision mortality by marking fences (Oklahoma)*, 27 Ecol. Restor. 141, 142 (2009).

BLM also needs to take a hard and site-specific look at how roads associated with the development of the proposed, past, and potential future oil and gas lease parcels may impact lesser prairie-chicken.

Roads present a serious threat to LPC populations due to collision mortality. For example, in the highly fragmented habitat of western Oklahoma, collisions with fences, vehicles, or powerlines accounted for 42.4% of all lesser prairie chicken mortality, versus 14.3% of mortality in the less-fragmented habitats of New Mexico.[147] In LPC habitat in New Mexico, parcel size of private lands is currently ten times larger, and roads, fences and power lines are one-half to one-third as dense.[148] This habitat and survival benefit to the LPC population in New Mexico would be lost if this area was open to any further development.

Roads also cause the LPC to avoid otherwise suitable nearby habitat due to noise pollution from vehicles on the roadway, especially for the critical purpose of reproduction and rearing their young.[149] LPCs avoid habitats within 785 meters of roads.[150] LPC lek density increased with decreasing density of paved roads, and LPC preference for constructing leks increases as the potential nesting site's distance from highways also increases.[151] [152] Habitats with the greatest lek density had lower densities of paved roads and of unpaved roads, with paved roads having the stronger negative influence.[153] Likewise, lek abandonment has been shown to increase as a function of the miles of road within 1.6 km of the leks,[154] and nest success increases with distance from unimproved roads.[155]

In addition, roads are a conduit for the spread of invasive weeds along roadways and in adjacent habitats, which diminish the quality of LPC habitat[156]; disturbance of soils and vegetation during road construction provides ideal habitat for weed establishment, and construction equipment and subsequent vehicle use transports weed seeds into the road corridor.[157] Non-native invasive plants such as Bermuda grass, Old World bluestem, Russian

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[147] **Exhibit 163,** Michael A. Patten et al, *Habitat fragmentation, rapid evolution and population persistence*, Evol. Ecol. Res. 7, 235 (2005).
[148] *Id.*
[149] **Exhibit 164,** Forman, R.T.T., and L.E. Alexander, *Roads and their major ecological effects*, Ann. Rev. Ecol. Syst. 29, 207 (1998).
[150] **Exhibit 165,** Robel, R. J. et al., *Effect of energy development and human activity on the use of sand sagebrush habitat by Lesser Prairie Chickens in southwestern Kansas*, Trans. N. Am. Wildl. Nat. Res. Conf. 69, 251 (2004).
[151] **Exhibit 166,** Timmer, J.M. et al., *Spatially explicit modeling of lesser prairie-chicken lek density in Texas*, J. Wildl. Manage. 78, 142 (2014).
[152] **Exhibit 167,** Jarnevich, C.S. and M.K. Laubhan, *Balancing energy development and conservation: A method utilizing species distribution models*, Envtl. Manage. 47, 926 (2011).
[153] **Exhibit 168,** Timmer, J.M., *Relationship of lesser prairie-chicken density to landscape characteristics in Texas*, MS Thesis, Texas Tech Univ., 131 (2012).
[154] Hunt, J.L. and T.L. Best, *Investigation into the decline of populations of the lesser prairie chicken (Tympanuchus pallidicinctus) on lands administered by the Bureau of Land Management, Carlsbad Field Office, New Mexico*, Final Report to the Bureau of Land Management, Cooperative Agreement GDA010007, 160 (2004), Exhibit 155.
[155] **Exhibit 169,** Pitman, J.C. et al., *Location and success of lesser prairie-chicken nests in relation to vegetation and human disturbance*, J. Wildl. Manage. 69, 1259 (2005).
[156] **Exhibit 170,** Gelbard, J.L. and J. Belnap, *Roads as conduits for exotic plant invasions in a semiarid landscape*, Conserv. Biol. 17, 420 (2003).
[157] *Id.*

olive, autumn olive, and osage orange are of no value to the lesser prairie chicken[158]: "[w]herever exotic bluestems have been established, they have been nearly impossible to eliminate and proven to be aggressive invaders that are likely to further diminish the habitat quality of remaining native grasslands."[159]

3. **Habitat Fragmentation Due to Power Lines**

BLM also needs to take a hard and site-specific look at how power lines associated with the development of the proposed, past, and potential future oil and gas lease parcels may impact lesser prairie-chicken.

The LPC population is currently threatened by power lines. Overhead power and telephone lines are a significant source of collision mortality for lesser prairie chickens in Oklahoma and New Mexico.[160] Leading researchers recommend the burial of overhead lines in LPC habitat. [161]

LPCs also attempt to avoid power lines, further fragmenting populations and reducing the amount of habitat available for living and reproducing. LPC avoidance of power lines may serve as a movement barrier, further fragmenting habitats.[162] LPCs are rarely found within 0.4 km of power lines, even if the habitat was otherwise suitable for nesting.[163] LPCs avoid transmission lines for both nests and leks: few nest sites were located within 2 km of transmission lines,[164] and transmission lines have a negative relationship with lek density for lesser prairie chickens.[165] [166] Furthermore, the closer a lek is to a powerline, the more likely it is to be abandoned.[167] Placement of power lines near leks may negatively affect the breeding activities of males.[168]

Overhead electrical transmission lines emit electromagnetic fields that can negatively affect the behavior, reproductive success, growth and development, physiology, endocrinology, and oxidative stress of wild birds in ways that vary by species.[169] Although experiments involving LPCs have yet to be undertaken, there is a strong possibility that electromagnetic fields also negatively affect the LPC.

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[158] **Exhibit 171,** Bidwell.T. et al., *Ecology and management of the lesser prairie-chicken in Oklahoma*, Stillwater, OK: Oklahoma State Cooperative Extension Service, 17 (2002).
[159] Rodgers, R.D, *A history of lesser prairie-chickens*, Stud. Avian Biol. 48, 15 (2016).
[160] Wolfe, D.H et al., *Causes and patterns of mortality in lesser prairie-chickens Tympanuchus pallidicinctus and implications for management*, Wildl. Biol. 13, 95 (2007), Exhibit 161.
[161] *Id.*
[162] **Exhibit 172,** Hagen, C. A. et al., *Impacts of anthropogenic features on habitat use by Lesser Prairie-Chickens*, Studies in Avian Biology (no. 39), University of California Press, Berkeley, CA, 63 (2011).
[163] Robel et al, *supra*, and Pitman et al, *supra*.
[164] Pruett et al, *supra*.
[165] **Exhibit 173,** Lautenbach, J.M., *Lesser prairie-chicken reproductive success, habitat selection, and response to trees*, M.S. Thesis, Kansas State Univ., 142 (2015).
[166] Timmer, *supra*.
[167] Hunt ann Best, *supra*.
[168] **Exhibit 174,** Hagen, C. A. et al. *Managing lesser prairie chicken populations and their habitats*, Wildl. Soc. Bull. 32, 69 (2004).
[169] **Exhibit 175,** Fernie, K.J., and S.J. Reynolds, *The effects of electromagnetic fields from power lines on avian reproductive biology and physiology: a review*, J. Toxicol. Environ. Health Part B 8, 127 (2005).

Power lines also increase predator habitat, which increases LPC mortality. Raptors and common ravens nest on transmission towers.[170] The increased predator presence along power lines can lead to LPC avoidance of these structures, and increased stress and risk of predation for LPCs that remain nearby.

ii. Impacts to Lesser Prairie-Chicken from Climate Change

BLM also needs to take a hard look at the impacts of climate change on lesser prairie-chicken. The effects of climate change in the LPC's habitat are highly likely to exacerbate many existing challenges the species faces, particularly those related to its habitat. Climate change effects, including increased temperatures, drought, extreme weather events, vegetation changes, and the spread of parasites and disease, will likely further harm the LPC population by reducing its ability to nest, reproduce, obtain sufficient nourishment, and avoid deleterious predation.

1. **Increased Temperatures**

Increased summer temperatures and above-average winter temperatures, predicted as a result of climate change, will likely contribute to a decline in LPC nest survival rates.[171] Higher temperatures significantly contribute to lower daily brood survival.[172] LPC populations in New Mexico and Texas are more vulnerable to climate change than their counterparts in Kansas, as they face temperatures 7°C warmer than the latter.[173] Great Plains temperatures have already increased 1.5°F since the 1960s and 1970s baseline level.[174] Experts predict temperature increases of 2.5°F to 6°F above this baseline by 2050,[175] of 2.8°F to 3.5°F by 2060,[176] and of 5°F to 13.5°F above the baseline by 2090.[177] As a result of these temperature increases, LPC nest survival rates may fall below the level of viability for population persistence between 2050 and 2080.[178] Furthermore, the expected increase in temperature variability across the LPC habitat due to climate change may decrease survival of adult and juvenile chickens, in part through heat stress.[179]

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[170] **Exhibit 176,** Steenhof, K et al., *Nesting by raptors and common ravens on electrical transmission towers*, J. Wildl. Manage. 57, 271 (1993).
[171] *See* **Exhibit 177,** Cynthia P. Melcher, U.S. Geological Survey, Southern Great Plains Rapid Ecoregional Assessment—Pre-Assessment Report 170 (Timothy J. Assal et al. eds., 2015); *see also* **Exhibit 178,** Blake Grisham et al., *The Predicted Influence of Climate Change on Lesser Prairie-Chicken Reproductive Parameters*, (July 11, 2013), 8 PLOS ONE e68225.
[172] **Exhibit 179,** Fields et al., *Nest and Brood Survival of Lesser Prairie-Chickens in West Central Kansas*, 70 J. Wildlife Mgmt. 931, 935 (2009).
[173] *See* Grisham et al., *supra*, at 7.
[174] **Exhibit 180,** Thomas R. Karl, Global Climate Change Impacts in the U.S., 125 (Jerry M. Melillo et al., eds., 1st ed. 2009).
[175] *Id.* at 125.
[176] M. McLachlan, A. Bartuszevige, and D. Pool, *Evaluating the potential of the Conservation Reserve Program to offset projected impacts of climate change on the Lesser Prairie-Chicken (Tympanuchus pallidicinctus): a conservation effects assessment Project,* Playa Lakes Joint Venture, Lafayette, CO, USA (2010) at 17.
[177] Thomas R. Karl, Global Climate Change Impacts in the U.S., 125 (Jerry M. Melillo et al., eds., 1st ed. 2009), Exhibit 177.
[178] Grisham et al., *supra*, at 7.
[179] *See* **Exhibit 181,** Wolfe et al., *The Lesser Prairie-Chicken in the Mixed-Grass Prairie Ecoregion of Oklahoma, Kansas and Texas*, *in* 48 Studies in Avian Biology 299-314, 306 (David A. Haukos & Clint Boal 1 ed. 2016).

2. **Drought**

In addition to increased and more variable temperatures, climate change will likely lead to increased drought in the southern Great Plains region, which will further harm the LPC's chances of survival.[180] LPCs in New Mexico and Texas are more vulnerable to climate change than their counterparts in Kansas because they receive 7% less relative humidity than do the latter.[181] Precipitation across the LPC habitat will likely decrease by 10% by 2060.[182] Such decreased precipitation will further contribute to lower rates of adult and juvenile LPC survival.[183] Moreover, population fluctuations resulting from prolonged periods of drought may further threaten the survival of fragmented LPC populations.[184]

3. Extreme Weather Events

Extreme weather events, exacerbated by climate change, are expected to further threaten the LPC's habitat and survival.[185] Weather events including tornadoes, hail storms, floods, heat waves, and cold waves will likely occur more frequently across the southern Great Plains due to climate change.[186] These events may temporarily reduce the quality of LPC habitat or even remove such habitat.[187] Extreme heat events, in addition to the trend of generally rising temperatures detailed above, are projected to increase throughout this century and increase mortality rates for both adult and juvenile LPCs.[188] Intense storms during the nesting season may lead to significant declines in reproduction and survival rates for local LPC populations.[189]

4. Vegetation Changes

Climate change-induced changes in quantity and quality of vegetation across LPC habitat will likely contribute to a decline in the species' population over the next 60 years.[190]

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[180] *See* Wolfe et al., *supra*, at 306.
[181] *See* Grisham et al., *supra*, at 7.
[182] McLachlan et al., *supra*, at 7.
[183] *See* Wolfe et al., *supra*, at 306
[184] *See* **Exhibit 182,** Sean Kyle et al., Arizona Game and Fish Department, The Lesser Prairie-Chicken Range-wide Conservation Plan at 35 (William E. Van Pelt ed., 2013).
[185] *See* WildEarth Guardians et al. at 107, *supra*.
[186] *See* Blake Grisham et al., *Climate Change*, in Studies in Avian Biology 235 (David A. Haukos & Clint Boal 1 ed. 2016).
[187] *See* Sean Kyle et al., Arizona Game and Fish Department, The Lesser Prairie-Chicken Range-wide Conservation Plan at 36 (William E. Van Pelt ed., 2013), Exhibit 182.
[188] *See* Cynthia P. Melcher, U.S. Geological Survey, Southern Great Plains Rapid Ecoregional Assessment—Pre-Assessment Report 170 (Timothy J. Assal et al. eds., 2015 at 169, Exhibit 177; *see generally* David M. Anderson et al., U.S. Global Change Research Program, Global Climate Change Impacts in the U.S. (Thomas R. Karl et al. eds., 2009).
[189] *See* Sean Kyle et al., Arizona Game and Fish Department, The Lesser Prairie-Chicken Range-wide Conservation Plan 35 (William E. Van Pelt ed., 2013) at 35, Exhibit 182.
[190] *See* McLachlan, A. Bartuszevige, and D. Pool, *Evaluating the potential of the Conservation Reserve Program to offset projected impacts of climate change on the Lesser Prairie-Chicken (Tympanuchus pallidicinctus): a conservation effects assessment Project,* Playa Lakes Joint Venture, Lafayette, CO, USA (2010) at 29.

Decreased shinnery oak distribution across the LPC habitat, which is expected to result from rising temperatures, increased drought, and other climatic effects, will reduce the amount of shrub cover and food supply available to the LPC.[191] This decreased shrub cover will also detrimentally affect the LPC's selection of nest sites and its adult survival rates.[192] By changing the structure and composition of plant communities, climate change will likely lead these communities to become less suitable for the LPC, a habitat specialist.[193] Drought-induced effects on vegetation composition and structures may in fact be the main mechanism of climate change related harm to the LPC population's viability.[194]

Climate change impacts on the geographical distribution of plants across the LPC habitat are also expected to reduce the quality and suitability of such habitat for the LPC.[195] Among the most serious scenarios predicted for vegetation change is a 100% loss of Great Plains grassland by 2030 in New Mexico, which would result in an extinction of the LPC in this region.[196]

As mentioned above, habitat fragmentation is a serious existing threat to the LPC. In habitats as fragmented as those of the LPC currently, climate change may lead to extinctions of the LPC by overwhelming small, local populations' ability to adapt, and reducing their genetic diversity.[197]

5. Parasites and Disease

Climate change may further threaten the LPC by leading to an increase in parasites including the West Nile Virus (hereinafter, WNV) across their habitat.[198] The WNV may decrease LPC hens' ability to nourish themselves, and the quality of their eggs, thus reducing rates of chick survival.[199] Climate change may exacerbate the transmission speed of the WNV through the LPC habitat by enabling increased mosquito speed and activity,[200] enhanced adult

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[191] *See* Cynthia P. Melcher, U.S. Geological Survey, Southern Great Plains Rapid Ecoregional Assessment—Pre-Assessment Report 170 (Timothy J. Assal et al. eds., 2015 at 170, Exhibit 177; *see also* William E. Van Pelt, ed., Western Ass'n on Fish & Wildlife Agencies, The Lesser Prairie-Chicken Range-wide Conservation Plan: Cheyenne, Wyo. (2013).
[192] *See* Wolfe et al., *supra*, at 306.
[193] *See* Sean Kyle et al., Arizona Game and Fish Department, The Lesser Prairie-Chicken Range-wide Conservation Plan 35 (William E. Van Pelt ed., 2013) at 35, Exhibit 182.
[194] Grisham et al., *supra*, at 231.
[195] *See* **Exhibit 183,** Camille Parmesan, *Ecological & Evolutionary Responses to Recent Climate Change*, 37 Annual Review of Ecology, Evolution & Systematics 637–669, 637 (2006).
[196] **Exhibit 184,** Patty Glick et al. eds., Nat'l Wildlife Fed'n, Scanning the Conservation Horizon: A Guide to Climate Change Vulnerability Assessment 100 (2011).
[197] *See* **Exhibit 185,** Alistair S. Jump & Josep Peñuelas, *Running to Stand Still: Adaptation & the Response of Plants to Rapid Climate Change*, 8 Ecology Letters 1010-1020, 1017 (2005).
[198] *See* WildEarth Guardians et al., *supra*, at 110.
[199] *See* Markus J. Peterson, *Macroparasitic, Microparasitic & Noninfectious Diseases of Lesser Prairie-Chickens*, *in* 48 Studies in Avian Biology 159-183, 176 (David A. Haukos & Clint Boal 1 ed. 2016).
[200] **Exhibit 186,** P. Mottram et al., *The Effect of Temperature on Eggs and Immature Stages of Culex Annulirostris Skuse (Diptera: Culicidae)*, 25 Australian J. Entomology 131-136 (1986).

mosquito survival,[201] and faster development of the virus within mosquitoes.[202] Furthermore, since the increased drought resulting from climate change will likely lead to a higher concentration of LPCs around rarer, diminishing water sources, mosquitoes are predicted to benefit from an increase in their food supply - of LPC individuals around stagnant water.[203]

6. Noise Pollution

New oil and gas drilling would create new and significant noise pollution, posing a serious threat to nearby LPC populations. Drilling and its associated activities produce many noises not normally found in nature: the sounds of drilling, construction, and maintenance, along with the increase in extremely loud heavy-duty truck traffic necessary to transport people, drilling materials, and extracted oil and gas to and from drilling sites.[204] This noise pollution has been shown to be particularly disruptive to LPC leks and their successful reproduction.[205] In one study, researchers created recordings of sounds associated with oil and gas drilling and played them near leks in the wild, while observing other, unaffected lek sites as a control.[206] The study found a strong negative effect on both male and female attendance at the leks subjected to the noise, as compared to the control group.[207] Some of the leks subjected to the noises of oil and gas development showed a drop in female attendance of over 70 percent.[208]

These results have been supported by multiple other studies, including a study showing a statistically significant difference of 4 dB greater noise pollution at abandoned leks than active leks. [209] Sound disturbance at lek sites is likely to be "devastating to breeding efforts," and any further development of oil and gas drilling in current LPC habitat would pose a serious risk to the population's survival.[210]

7. Environmental and Pollution Threats

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[201] *See generally* **Exhibit 187,** Charles L. Bailey, *Winter Survival of Blood-fed and Non-blood-fed Culex pipiens*, 31 Am. J. Tropical Med. Hygiene 1054–1061 (1982).
[202] *See generally* **Exhibit 188,** David J. Dohm et al., *Effect of Envtl. Temperature on the Ability of Culex Pipiens (Diptera: Culicidae) to Transmit West Nile Virus*, 39 J. Med. Entomology 221-225 (2002).
[203] *See generally* **Exhibit 189,** Pamela Anderson et al., The Ctr. for Health & the Global Envt., Harvard Med. School, Climate Change Futures: Health, Ecological & Econ. Dimensions (Paul R. Epstein & Evan Mills eds., 2005).
[204] **Exhibit 190,** Francis, C.D., C.P. Ortega, and A. Cruz, *Noise pollution changes avian communities and species interactions,* (2009) at 1418.
[205] **Exhibit 191,** Blickley, J.L., D. Blackwood, and G.L. Patricelli, *Experimental Evidence for the Effects of Chronic Anthropogenic Noise on Abundance of Greater Sage-Grouse at Leks* (2012) at 467.
[206] *Id.*
[207] *Id.*
[208] *Id.*
[209] *See* J.L. Hunt & T.L. Best, *Investigation into the decline of populations of the lesser prairie chicken (Tympanuchus pallidicinctus) on lands administered by the Bureau of Land Management, Carlsbad Field Office, New Mexico*, Final Report to the Bureau of Land Management, Cooperative Agreement GDA010007 at 142 (2004), Exhibit 159.
[210] Smith, H., K. Johnson, and L. DeLay, *Survey of the lesser prairie chicken on Bureau of Land Management lands, Carlsbad Resource Area, NM. Unpubl. Rep. to the Bureau of Land Management. Albuquerque, NM: New Mexico Natural Heritage* (1998) at 6.6 Program at 6.

New oil and gas drilling, and any new hydraulic fracturing, will also likely increase LPC exposure to hazardous chemicals, and may lead to very damaging changes to their habitat.

Spills and emissions from oil and gas well pads, from the trucks that transport drilled oil and gas, and from trucks transporting fluids and compounds necessary for drilling are routine.[211] Researchers have documented LPC deaths in other areas "from sludge pits and poisonous gases" attributed to oil and gas drilling.[212]

No new hydraulic fracturing should happen in the BLM lands up for leasing until the impact of fracking on the LPC has been further studied. While there is no research yet on the direct impact of hydraulic fracturing on the LPC, southeastern New Mexico is increasingly viewed as a prime area for hydraulic fracturing.[213] However, multiple studies have found environmental impacts of fracking on the environment, from increased erosion, to chemical spills, to polluting the water supply.[214] [215] Until there is further research done, considering all the threats already facing the LPC, there should be no further disruption of the LPC's ecosystem with potentially hazardous activities.

G. BLM Must Properly Analyze Federal or State Law and Policy.

There are several federal and state government laws and policies that set GHG emission reduction targets or commitments, which authorization of the proposed leases will likely threaten. On the federal side, President Biden announced a goal to achieve net-zero emissions by 2050,[216] as well as a target to reduce GHG emissions by 50-52% by 2030, compared to 2005 levels.[217] In addition, the United States is a signatory to the 2015 Paris Agreement, committing to a goal of limiting global temperature increase well below 2 C, pursuing efforts to limit the increase to 1.5 C, and committing to reaching global peaking of GHGs as soon as possible.

On the state side, for example, both Colorado and New Mexico have statutes and executive orders setting emission reduction goals. In Colorado, HB19-1261 requires the state to reduce GHG emissions by at least 26 percent in 2025, at least 50 percent by 2030, and at least 90 percent by 2050, relative to 2005 pollution levels. In New Mexico, Executive Order 2019-003 declares the state's support of the 2015 Paris Agreement goals and orders the state to achieve statewide reduction of GHG emissions of at least 45% by 2030, relative to 2005 levels.

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[211] **Exhibit 192,** Clancy, S.A., F. Worrall, R.J. Davies, J.G. Gluyas. *The potential for spills and leaks of contaminated liquids from shale gas developments.* 626 Sci. of the Total Env't. 1463, 1464 (June 1, 2018).
[212] Massey, M. *Long-range plan for the management of lesser prairie-chickens in New Mexico, 2002-2006. New Mexico Department of Game and Fish, Federal Aid in Wildlife Restoration* (2001) at 16, Exhibit 143.
[213] **Exhibit 193,** Tsvetana Paraskova, USA Today, *Is southeastern New Mexico the new sweet spot for shale?* (2017), available at https://www.usatoday.com/story/money/energy/2017/11/22/southeastern-new-mexico-new-sweet-spot-shale/882239001/.
[214] **Exhibit 194,** Williams, H.F.L., D.L. Havens, K.E. Banks, and D.J. Wachal *Field-based monitoring of sediment runoff from natural gas well sites in Denton County, Texas, USA,* (2008).
[215] **Exhibit 195,** Burton, G.A., K.J. Nadelhoffer, and K. Presley, *Hydraulic fracturing in the state of Michigan: Environment/ecology technical report. University of Michigan*. (2013).
[216] Executive Order 13990 (January 20, 2021).
[217] Executive Order 14008 (January 27, 2021).

BLM must discuss and evaluate how the proposed lease sales and their estimated GHG emissions may threaten violation of these federal and state laws and policies.

H. BLM Must Analyze Temporary Layflat Pipelines and Water Transport Infrastructure

BLM must explicitly analyze temporary layflat pipelines as part of the Proposed Action and cumulative impacts analysis. Recent oil and gas projects in the San Juan Basin increasingly rely on layflat pipelines to transport water for drilling and completion activities. These pipelines are functionally significant infrastructure and should not be treated as minor, incidental, or temporary features for purposes of NEPA review.

1. Connected Actions and Segmentation

Layflat pipelines are connected actions under NEPA because they are integral to well completion and interdependent with associated wells, access roads, and permanent pipelines. Wells cannot be completed without water transport infrastructure. Treating layflat pipelines as isolated or de minimis components risks improper segmentation and understates the full scope of environmental impacts, contrary to NEPA requirements.[218]

2. Elevated Spill Risk

Layflat pipelines are temporary, flexible surface lines that pose higher spill and failure risks than permanent, buried pipelines. They are typically installed above ground without secondary containment and are subject to vehicle traffic, weather exposure, UV degradation, and pressure fluctuations. Federal guidance recognizes that aboveground and temporary piping systems have heightened failure potential compared to permanent pipeline infrastructure.[219] Even small spills can cause lasting soil and vegetation damage in arid landscapes.

3. Inadequacy of Reactive Spill Response

BLM's reliance on post-approval spill response and remediation requirements under NTL-3A and 43 C.F.R. § 3162.5-1(c) does not substitute for NEPA's requirement to evaluate reasonably foreseeable risks before approval.[220]The EA must analyze spill likelihood, environmental consequences, and whether proposed monitoring and inspection measures are sufficiently specific and enforceable to prevent or detect failures.

4. Environmental Justice Considerations

[218] 40 C.F.R. § 1501.9(e)(1); *Kleppe v. Sierra Club*, 427 U.S. 390 (1976).

[219] U.S. DOT PHMSA, *Pipeline Failure Causes and Prevention Guidance.*, U.S. EPA, *Spill Prevention, Control, and Countermeasure (SPCC) Guidance for Oil Pipelines and Piping Systems*.

[220] *Robertson v. Methow Valley Citizens Council*, 490 U.S. 332, 352–53 (1989).

The increased use of layflat pipelines disproportionately affects rural, Tribal, and overburdened communities in the San Juan Basin that already experience cumulative impacts from oil and gas development. BLM must evaluate whether cumulative spill risks and monitoring gaps associated with layflat pipelines result in disproportionately high and adverse impacts to affected communities and Tribal resources.[221]

5. Alternatives and Cumulative Impacts

Layflat pipelines are a discretionary design choice. NEPA requires BLM to analyze reasonable alternatives that could reduce spill risk, including use of permanent pipelines, alternative transport methods, reduced-water completion techniques, or project redesign. BLM must also evaluate cumulative impacts from the increasing reliance on layflat pipelines across multiple projects, rather than continuing piecemeal review.[222]

6. Conclusion

Temporary layflat pipelines are integral components of modern oil and gas development with elevated spill risks and cumulative environmental and community impacts. NEPA requires BLM to clearly disclose and analyze these impacts, consider reasonable alternatives, and avoid segmented review.

I. Climate Impacts Beyond Aggregate GHG Totals

BLM must analyze climate impacts beyond high-level greenhouse gas emissions estimates. Oil and gas development infrastructure creates operational climate risks that are reasonably foreseeable and must be disclosed under NEPA, including emissions associated with infrastructure failures, emergency flaring, venting, pressure releases, and shutdown events.[223] These risks are heightened where projects rely on extensive surface and temporary infrastructure.

BLM must also evaluate how climate change stressors, including increased heat, extreme precipitation, and drought, affect infrastructure integrity and increase the likelihood and severity of spills and releases. NEPA requires analysis of how the Proposed Action both contributes to climate change and is affected by it, including implications for mitigation effectiveness over time.[224]

J. Water Quantity and Cumulative Depletion Impacts

BLM's analysis must address water quantity impacts, not solely water quality. Groundwater withdrawals for drilling, completion, and associated operations reduce available water resources

[221] Exec. Order 12898; CEQ, *Environmental Justice Guidance Under NEPA* (2023).
[222] *Grand Canyon Trust v. FAA*, 290 F.3d 339 (D.C. Cir. 2002).
[223] CEQ, Final Guidance for Federal Departments and Agencies on Consideration of Greenhouse Gas Emissions and the Effects of Climate Change under NEPA (2023).
[224] Center for Biological Diversity v. NHTSA, 538 F.3d 1172 (9th Cir. 2008).

and can affect connected surface waters, wetlands, and riparian systems, even where water is characterized as non-potable.[225]

BLM must evaluate cumulative water withdrawals across multiple wells and projects in the planning area, particularly in the context of regional drought and climate-driven hydrologic stress. Failure to analyze cumulative depletion risks understating long-term impacts to watersheds, ecosystems, and water availability for other uses.

K. Enforcement Capacity and Mitigation Feasibility

NEPA requires that mitigation measures be, enforceable, and supported by adequate agency capacity. BLM must disclose the assumptions underlying its ability to monitor compliance, conduct inspections, and enforce spill prevention and remediation requirements.[226][227]

Reliance on discretionary inspections or post hoc enforcement does not constitute effective mitigation where staffing levels, inspection frequency, or enforcement resources are insufficient to ensure compliance. The EA must explain how proposed mitigation will be implemented and enforced in practice.

L. Reasonable Range of Alternatives

BLM must evaluate a reasonable range of alternatives that would avoid or substantially reduce environmental and community impacts. Alternatives analysis should not be limited to minor design modifications but must include options that meaningfully change the scope or intensity of development.

Such alternatives include, but are not limited to:

- Reduced-leasing or no-leasing alternatives in sensitive or overburdened areas;
- Phased development alternatives that limit infrastructure density and cumulative impacts;
- Alternatives prioritizing reduced water use, reduced surface disturbance, or avoidance of high-risk infrastructure;
- The no-action alternative as a genuine baseline for comparison.

Failure to analyze these alternatives would undermine the purpose of NEPA's alternatives requirement.

M. Analysis Required for Specific Parcels

In addition to the analysis requested throughout these comments, BLM must also complete specific analyses as it relates to the following parcels:

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[225] G*reat Basin Resource Watch v. BLM*, 844 F.3d 1095 (9th Cir. 2016)
[226] Robertson v. Methow Valley Citizens Council, 490 U.S. 332, 352–53 (1989).
[227] 42 U.S.C. § 4332(2)(C); Friends of Yosemite Valley v. Kempthorne, 520 F.3d 1024 (9th Cir. 2008).

- NM-2026-05-6909- BLM must analyze potential air, water and climate impacts of this parcel to residents of Carlsbad. This parcel appears to be within 1000 feet of residences near Riverside Country Club, and Ocotillo Elementary School. BLM must analyze health impacts not only to the city or region as a whole, but also analyze potential health impacts to residents in the neighborhood of the proposed drilling, as well as an analysis of the potential health impacts to children who attend Ocotillo Elementary School. Also, BLM must provide an analysis of the neighborhood or vicinity of the proposed leasing and consider pre-existing health disparities in that community in order to understand the potential impacts of increased development there. Additionally, parcel 6909 is close to a parcel that may be sold to the City of Carlsbad. (DOI-BLM-NM-P020-2025-1553-RMP-EA) BLM should provide an analysis of potential impacts of the development to that parcel.
- NM-2026-05-0614- BLM must analyze potential air, water and climate impacts of this parcel to residents of Carlsbad. In addition to that, BLM must analyze the impacts of the development of Parcel 0614 to persons utilizing the nearby shooting range & recreating in Living Desert State Park. BLM must analyze health and air quality impacts to local users of these resources as well as residents of the neighborhoods nearby these parcels specifically. Also, BLM must provide an analysis of the neighborhood or vicinity of the proposed leasing and consider pre-existing health disparities in that community in order to understand the potential impacts of increased development there.
- NM-2026-05-0599, NM-2026-05-0597, NM-2026-05-0598- These parcels are located near Washington Ranch, a locally owned event center. BLM must provide health, air and water quality impact analysis of any potential impact to Washington Ranch, including any recreators or employees who may be repeatedly exposed to impacts of additional drilling in the vicinity of the Ranch. Additionally, these parcels are near Rattlesnake Springs, a recreational unit of Carlsbad Caverns State Park. BLM must provide health, air and water quality impact analysis of any potential impact to Rattlesnake Springs and Carlsbad Caverns State Park as a whole.
- NM-2026-05-0650 – This parcel is near or atop Intrepid Potash (East), a potash mine. BLM must provide a specific analysis of any impacts related to the overlapping of these two areas, including an analysis of any applicable leasing stipulations, and any possible environmental, geological, or health and safety hazards, including the potential for mine flooding, ground subsidence (sinkholes), and the salinization of water sources due to the high solubility of potash salts. BLM must also provide an analysis of the application of existing regulations regarding oil and gas development near potash mines, and how those regulations will be applied here.
- NM-2026-05-0651, NM-2026-05-6908, NM-2026-05-0655 - includes DOE land (NM-2026-05-6908). These parcels abut the Waste Isolation Pilot Plant (WIPP) site, and BLM must analyze any potential impacts of both development of these parcels and the potential for any accidents stemming from proximity to the WIPP site. BLM must analyze the potential that horizontal development of these wells could puncture nuclear waste sites, release radioactivity, contaminate

groundwater, or cause seismic activity that could then lead to a breach of radioactive material. BLM must analyze the potential for groundwater contamination of the Rustler aquifer caused by a drilling intersection with pressurized brine reservoirs located below the WIPP waste rooms. Additionally, BLM must analyze the potential for increased seismic activity, and the possibility that seismic activity near the site could potentially compromise the integrity of salt formations housing the WIPP waste. BLM must provide an analysis of the potential health, air quality, and water quality impacts of a breach of the WIPP site to the region and its residents.

- NM-2026-05-0490 - This parcel is near or atop Intrepid Potash (North), a potash mine. BLM must provide a specific analysis of any impacts related to the overlapping of these two areas, including an analysis of any applicable leasing stipulations, and any possible environmental, geological, or health and safety hazards, including the potential for mine flooding, ground subsidence (sinkholes), and the salinization of water sources due to the high solubility of potash salts. BLM must also provide an analysis of the application of existing regulations regarding oil and gas development near potash mines, and how those regulations will be applied here. Additionally, this parcel is near Laguna Plata, which is an archaeological district in Lea County listed on the National Register of Historic Places, which includes 26 contributing sites. BLM must analyze any potential impacts to archaeological resources. Additionally, Laguna Plata may be a special management area or Area of Critical Environmental Concern (ACEC) and may be closed to mineral leasing or surface occupancy. BLM must analyze all overlying designations for parcel 0490 and the potential impact of any development therein.
- NM-2026-05-0411: This parcel is approximately 0.25 miles from the Chaco Culture National Historical Pak 10 mile withdrawal boundary. BLM must analyze whether or not this development is possible without infrastructure impacting the withdrawal zone and whether development of this parcel will have any impacts within the withdrawal zone.
- NM-2026-05-0666, 0667, 0668, 0669, 0670, 0671, 0672: These parcels appear to be within a half mile of residences. BLM must analyze health impacts not only to the region as a whole, but also analyze potential health impacts to residents in the immediate vicinity of the proposed drilling, as well as an analysis of the potential health impacts to children who may reside there and have special health vulnerability. Also, BLM must provide an analysis of the neighborhood or vicinity of the proposed leasing and consider pre-existing health disparities in that community in order to understand the potential impacts of increased development there.
- NM-2026-05-0411, 0666, and 0667: these parcels overlap with areas available for solar energy development according to BLM's Western Solar Plan. BLM must analyze how any development on these parcels will impact potential solar development under the Western Solar Plan.

For the reasons set forth above, all parcels in the New Mexico Q2 '26 lease sales, listed in Appendix A, in addition to all parcels proposed and expected for lease in 2026, require an adequate NEPA analysis.

U.S. Bureau of Land Management
New Mexico State Office
Attn: State Director
Attn: Catherine Brewster
301 Dinosaur Trail
Santa Fe, NM 87508

U.S. Bureau of Land Management
Farmington Field Office
Attn: ajennings@blm.gov
6251 College Blvd. A
Farmington, NM 87402

U.S. Bureau of Land Management
Pecos District Office
Attn: Catherine Brewster
2909 West Second Street
Roswell, NM 88201-2019

U.S. Bureau of Land Management
Wyoming State Office
5353 Yellowstone Rd
Cheyenne, WY 82009

Via Eplanning

Re: Protest Comments for the New Mexico and Wyoming Q2 2026 Oil and Gas Lease Parcel Sales (DOI-BLM-NM-F010-2026-0001-EA, DOI-BLM-NM-P000-2026-0001-EA, DOI-BLM-WY-0000-2026-0001-EA)

Appendix D Exhibit List

Exhibit 138, Sara Oyler-McCance, *Rangewide Genetic Analysis of Lesser Prairie-Chicken Reveals Population Structure, Range Expansion, and Possible Introgression*, 17 Conservation Genetics 643 (2016).

Exhibit 139, L. McDonald, *Range-Wide Population Size of the Lesser Prairie-Chicken*: *2012, 2013, 2014, 2015, and 2016*. Technical Report for the W. Ass'n of Fish and Wildlife Agencies (2016).

Exhibit 140, WildEarth Guardians et al., *Petition to List the LPC (Tympanuchus pallidicinctus) & Three Distinct Population Segments Under the U.S. Endangered Species Act & Emergency Listing Petition for the Shinnery Oak Prairie & Sand Sage Prairie Distinct Population Segments* 9 (Sept. 8, 2016).

Exhibit 141 Patten et al., *Effects of Microhabitat and Microclimate Selection on Adult Survivorship of the Lesser Prairie-Chicken,* 69 Journal of Wildlife Mgmt. 1270 (2005).

Exhibit 142, Grisham et al., *Nesting Ecology and Nest Survival of Lesser Prairie Chickens on the Southern High Plains of Texas*, 78 Journal of Wildlife Management 857 (2014).

Exhibit 143, Michael Massey, *Long-Range Plan for the Management of Lesser Prairie Chickens in New Mexico*, Federal Aid in Wildlife Restoration Grant W-104-R41, Project 3.4, 47 (2001).

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Exhibit 145, Walter Van Pelt, *Lesser Prairie-Chicken Range-wide Conservation Plan Annual Progress Report* (2016).

Exhibit 146, Kristine Johnson, *GIS Habitat Analysis for Lesser Prairie Chickens in Southeastern New Mexico*, 6 BMC Ecology 18 (2006).

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Exhibit 148, Farrell Copelin, *Notes Regarding the History and Current Status of the Lesser Prairie Chicken in Oklahoma*, 37 Proc. Okla. Acad. Sci. 158 (1959).

Exhibit 149, Lena Larsson et al., *Fine-Scale Selection of Habitat by the Lesser Prairie-Chicken*, 58 Southwest Nat. 135 (2013).

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Exhibit 152, S. Harrison & E. Bruna, *Habitat fragmentation and large-scale conservation: What do we know for sure?* 22 Ecography 225, 229 (1999).

Exhibit 153, C.L. Pruett, M.A. Patten, and D.H. Wolfe, *Avoidance behavior by prairie grouse: Implications for development of wind energy*, 23 Conserv. Biol. 1253, 1254 (2009).

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Exhibit 155, S.D. Fuhlendorf, A.J. Woodward, D.M. Leslie Jr., and J.S. Shackford, *Multi-scale effects of habitat loss and fragmentation on lesser prairie-chicken populations of the US Southern Great Plains*, 17 Landscape Ecol. 617, 626 (2002).

Exhibit 156, Anne M. Bartuszegive and Alex Daniels, *Impacts of energy development, anthropogenic structures, and land-use change on lesser prairie-chickens*, 48 Stud. Avian Biol. 205, 212 (2016).

Exhibit 157, C.A. Hagen, B.K. Sandercock, J.C. Pitman, R.J. Robel, and R.D, *Spatial variation in lesser prairie-chicken demography: A sensitivity analysis of population dynamics and management alternatives*, 73 J. Wildl. Manage. 1325, 1330 (2009).

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Exhibit 163, Michael A. Patten et al, *Habitat fragmentation, rapid evolution and population persistence*, Evol. Ecol. Res. 7, 235 (2005).

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Exhibits marked with an asterisk are hereby provided at the protest stage.