

October 31, 2023

Doug Vilsack
BLM Colorado State Director
Denver Federal Center
Building 40
Lakewood, Colorado 80225

Subject: Draft Resource Management Plan Supplemental Environmental Impact Statement Colorado River Valley Field Office and Grand Junction Field Office

Dear Director Vilsack,

On behalf of the [Western States and Tribal Nations Natural Gas Initiative \(WSTN\)](#), I write today to offer comments on the Colorado River Valley Field Office and Grand Junction Field Office Supplemental EIS (NEPA Number DOI-BLM-CO-G020-2022-0001-RMP-EIS) which reflect on the economic, environmental and energy security impacts that the proposed Alternatives could precipitate.

WSTN is a bipartisan, trans-national initiative, incorporated as a 501(c)4 and led by sovereign tribal nations, states and counties with the goal of creating rural economic development, advancing tribal self-determination and reducing global emissions through the export of clean natural gas from western North America to international markets.

WSTN's sole leadership comes from a board of directors appointed by the governors and/or executive leadership of states, counties and sovereign tribal nations who are signatories to WSTN's founding Memorandum of Understanding. The following sovereign tribal, state, and county governments are the current signers:

- The Ute Indian Tribe
- The State of Utah (Utah Governor's Office of Energy Development)
- The State of Wyoming (Wyoming Energy Authority)
- The State of Baja California, Mexico (Ministry of Tourism and Economic Development)
- The State of New Mexico (Energy, Minerals and Natural Resource Department)
- The Western Colorado counties of Garfield, Mesa, Moffat and Rio Blanco (These four counties share a single seat)
- The Southern Ute Indian Tribe
- The Jicarilla Apache Nation

The stakeholders that make up Western States and Tribal Nations Natural Gas Initiative ask the BLM to consider a comprehensive Supplemental EIS reflective of the Biden Administration’s global climate change objectives and its goals on advancing policies supporting rural economic development. Also, in recognition of the current global upheaval with escalating conflicts in Ukraine, the Middle East and with a simmering conflict with China over the status of Taiwan, we ask that the Supplemental EIS take into account the Biden Administration’s key foreign policy and energy security objectives, which we will further outline.

The Role of Natural Gas in Reducing Global Emissions

As you are aware, global demand for clean energy supplies is soaring, led by economic growth and fuel switching in China, Japan, South Korea, Taiwan and India and Europe’s push to diversify from embargoed Russian natural gas. Natural gas from western basins in the U.S. can play a key role in meeting those energy needs by providing reliable, cleaner baseload power to displace higher carbon fuels and foster renewable energy deployment by balancing intermittency issues and supporting related supply chains.

While WSTN shares the mission of reducing global greenhouse gas (GHG) emissions, our original vision is predicated on the fact that GHG emissions know no national or regional boundaries. When that reality is factored into GHG analyses, it is clear that not all emissions are additive to the global tally – some are reductive.

Colorado’s in particular would be reductive if exported to Asian markets to displace coal-fired generation. Colorado led the nation with the first oil and gas methane regulations established in 2014. More recently, the Colorado Air Quality Control Commission adopted a new rule requiring direct measurement of methane emissions and demonstrating with real-world data that oil and gas operators are meeting emission reduction standard.

A 2021 study commissioned by WSTN found that the export of Rockies-sourced liquefied natural gas from the North American West Coast to **China, India, Japan, South Korea, and Taiwan would reduce net life cycle emissions by 42%-55%** if used to replace coal-fired energy generation in those countries. As you consider alternatives that balance all uses of federal land in the decision area, WSTN encourages consideration of additional research showing that responsible, well-regulated natural gas production and exports can actually reduce global emissions, as evidenced by the study’s findings, [available here](#).

Crucially, the report accounts for the life cycle greenhouse gas emissions impact of Rockies-sourced gas by assessing every point of the entire LNG supply chain, starting with production at the well head and ending with the emissions from electricity transmission and distribution in the destination nations.

This report has its roots in earlier studies including a 2016 Department of Energy National Energy Technology Laboratory lifecycle analysis (updated in 2019 and [available here](#)) and a [2015 paper by the University of Calgary](#) that explored how the destination of LNG affected its climate impact. One of the University of Calgary authors led the WSTN study, working with peers from the University of Utah to complete it.

WSTN is in the process of updating and expanding its own study, in light of the tectonic shift in the global LNG trade caused by the Russian invasion of Ukraine as well as advancements in methane reduction being made by Colorado's natural gas producers, as well as the other states and tribal nations that form WSTN's membership.

Piceance Natural Gas Resource Base- Rural Economic Development

It is WSTN's assertion that the geological assessment that is the basis for BLM's Reasonable Foreseeable Development (RFD) analysis is based on outdated information and must be updated.

In a 2016 analysis, the U.S. Geological Survey (USGS) conducted its second largest assessment of potential shale & tight gas resources to that date. USGS determined the Mancos Shale in the Piceance Basin of Colorado contains an estimated mean of 66 trillion cubic feet of shale natural gas, 74 million barrels of shale oil and 45 million barrels of natural gas liquids. This estimate is for undiscovered, technically recoverable resources.

The previous USGS assessment of the Mancos Shale in the Piceance Basin was completed in 2002 as part of a comprehensive assessment of [the greater Uinta-Piceance Province](#), and estimated 1.6 trillion cubic feet of shale natural gas.

Included in the 2015 CRVFO RMP/Final EIS documents is BLM's Appendix S Reasonable Development Scenarios: Oil and Gas in the Glenwood Springs Field Office Administrative Boundary, which on page 3 states, "This GSFO RFD geologic discussion is based heavily on the 2002 USGS Resource Assessment." On pages 31 to 33, it references the same 2002 USGS Resource Assessment as the basis for estimating undiscovered recoverable oil and natural gas resources and classifies areas within the Piceance Basin by potential.

In its 2016 assessment, USGS understood that technological advancements have increased the ability of operators to recover oil and natural gas resources and updated their resource assessment of the Piceance Basin in 2016. BLM must now update the RFD for the planning area and reclassify what is no-known, low, medium, and high potential for the planning area based on the best, most current 2016 assessment, not the outdated 2002 assessment. A reassessment using best available information is required under NEPA, especially since BLM has decided to propose that all areas deemed no-known, low, or medium potential would be completely off limits to fluid mineral development.

We request that BLM update its RFD Analysis to reclassify areas by potential using the 2016 USGS Resource Assessment and not the outdated 2002 USGS Resource Assessment.

These corrections/advancements are relevant to the context of Alternatives E & F, which were precipitated by a BLM legal settlement with a private plaintiff opposed to oil and gas production. As such, there appears to be a somewhat arbitrary assessment of which lands are to be stricken from potential future production because they have “no known, low, and medium oil and gas development potential.” That determination is better made by economic actors whose interest is in economically recovering the assets, and whose technical expertise is best-suited for making those decisions.

Removing the bulk of available leasing land forecloses the possibility of additional technological innovations making these areas and their potential reserves economically recoverable, which in turn will chill investment and the accompanying employment and rural economic contributions that come from private investment.

The BLM is right to note on page 2-17 that there will be significant economic impacts from Alternatives E & F, in particular the latter, which removes 95% of available land from future leasing opportunities. This, BLM acknowledges, would have employment impacts and potentially impact environmental justice communities. As advocates for rural economic development and tribal self-determination, WSTN questions whether any Alternatives, such as E & F, which countenance over \$2 billion a year in production losses (Figure E-1, pg. E-3) and over \$3.2 billion in lost employment/economic impact (Figure E-2, pg. E-4), should be considered at all without a more rigorous economic assessments and modeling.

LNG, the G7 and Energy Security

The last dimension involved is one of global energy security. Given the tremendous volatility in the world caused by the Russian/Ukraine war, the Israel/Hamas conflict and escalating tension with China over the status of Taiwan, increased need for U.S. LNG to support the energy security of our allies in Europe and Asia is paramount and cutting off one of the deepest and cleanest-production sources would be a self-inflicted wound.

Alternatives E & F remove the potential for 599-779 wells, where production is among the cleanest in the country and world, because of Colorado and the United States’ stringent environmental regulations.

The April 2023 G7 Ministerial Meeting on Climate, Energy and Environment in Sapporo, Japan, produced tangible progress toward the future of natural gas as a clean energy source integral to the evolution of future energy systems such as hydrogen.

The [final communique](#) articulating the use of low-methane intensity LNG exports to lower global emissions was one of the clearest declarations of qualified support for natural gas exports yet from the Biden Administration.

As Assistant Energy Secretary for International Affairs Andrew Light [told S&P Global](#) at the meeting, the U.S. government sees a "phenomenal future for abated natural gas as a clean energy source in the world" by reducing methane intensity. "We do think that when things stabilize as Ukraine wins the war, then we will see an increased premium to be paid for the lowest-carbon and methane gas there is," he said.

This outcome followed WSTN's work with the Japanese government, alongside that of our partners highlighted in our March 2023 Clean Energy Exports forum in Washington, D.C. In this venue, the Honorable Hirai Hirohide, Vice Minister of Japan's Ministry of Economy, Trade and Industry gave the keynote address in which he underscored Russian efforts to strengthen ties to the Global South. In his address, Vice Minister Hirohide stated "if the U.S. does not provide natural gas to developing nations, Russia will...."

Developing countries are ratcheting up calls for more global natural gas production and imports to pare down emissions from coal and bring billions of people out of poverty and the Biden Administration should well heed Vice Minister Hirohide's words.

Given the fears that LNG exports will drive domestic natural gas prices higher – which [did not materialize in 2023](#) despite the [U.S. exporting record amounts of LNG](#) – also merit further study in this context. As we stated at the outset, natural gas production and its environmental, economic and energy security impacts must all be carefully weighed in this Supplemental EIS.

WSTN remains a committed partner to all efforts to carefully and responsibly advance natural gas production and LNG exports from the Rockies Basins and stands ready to partner with the BLM to provide more information to help complete this Supplemental EIS.

Sincerely,



Andrew Browning
President
Western States and Tribal Nations Natural Gas Initiative



Cc: Tracy Stone-Manning, Director, BLM
Nada Culver, Principle Deputy Director, BLM
Laura Daniel-Davis, Acting Deputy Secretary, Department of Interior