



June 13, 2023

*Submitted via [eplanning.blm.gov](http://eplanning.blm.gov)*

Melanie Barnes  
State Director  
Bureau of Land Management  
New Mexico State Office  
301 Dinosaur Trail  
Santa Fe, NM 87508

**Re: BLM New Mexico November 2023 Oil and Natural Gas Lease Sale Environmental Assessment and Proposed Finding of No Significant Impact**

Dear Director Barnes:

Western Energy Alliance is pleased to see BLM is moving forward with the November 2023 oil and natural gas lease sale and submits these comments on the environmental assessment (EA) and proposed Finding of No Significant Impact (FONSI). The Alliance urges BLM to issue the FONSI for this EA and proceed expeditiously with the planned sale.

We are disappointed by the number of parcels that BLM is proposing to offer in this lease sale and the lack of transparency and understanding surrounding the process BLM used to select them. The number of parcels on the preliminary list is well below the 172 parcels offered during 2020, a pandemic year, and we question why only 6 parcels in New Mexico are being offered for this sale.

As a general matter, the EA thoroughly describes the affected environment and analyzes direct, indirect, and cumulative greenhouse gas (GHG) emissions in great detail. The methods used to estimate GHG emissions are reasonable and within the agency's discretion. The technical data that BLM relies upon and presents in the EA is comprehensive and is more than sufficient to satisfy the National Environmental Policy Act (NEPA) for purposes of informing BLM decision-making at the leasing stage.

While the EA includes an analysis of emissions and the social cost of GHG emissions (SC-GHG) "for informational purposes only," BLM overstates the costs and ignores the benefits of leasing the parcels. We disagree with the application of the SC-GHG to individual lease sales. BLM is not under any legal requirement to utilize the SC-GHG in environmental analyses and, in fact, it is not a tool that provides any meaningful information to either the public or the decision-maker at this scale.

We appreciate that BLM took into account the fact that the lease parcels are located in areas of existing oil and natural gas development. We further agree with BLM that oil and

natural gas development, along with other associated industries, plays a significant role in the social and economic well-being of the area.

Lastly, we agree with BLM's assessment that the proposed action will not result in exceedance of any air quality related standard or result in significant impacts on other resources, including water quality and induced seismicity. We further agree that the proposed action is in compliance with the National Historic Preservation Act (NHPA) and the Endangered Species Act (ESA). As such, BLM's decision to issue an EA rather than a more comprehensive environmental impact statement (EIS) is correct and consistent with NEPA and legal precedent.

Western Energy Alliance welcomes New Mexico BLM's intent to conduct a November 2023 lease sale. We urge BLM to expeditiously issue a FONSI. Please do not hesitate to reach out with any questions.

Sincerely,



Kathleen M. Sgamma  
President