



February 6, 2023

Submitted via 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 May 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 May 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.

The Mineral Leasing Act mandates that BLM shall hold oil and natural gas lease sales “for each State where eligible lands are available at least quarterly and more frequently if the Secretary of the Interior determines such sales are necessary.”¹ Despite this mandate, BLM has not conducted any lease sales in New Mexico since June 2022, regardless of the existence of eligible lands available within the state, rendering BLM out of compliance with this statutory obligation. This draft EA is a welcome change and we encourage BLM to finalize it as soon as possible and move forward to sale with the full parcel list originally proposed and without deferrals.

We appreciate that BLM is proposing to offer an increased number of parcels and acreage compared to the 2022 lease sale; however, there is a lack of transparency and understanding surrounding the process BLM used to select parcels for this lease sale. The number of parcels on the preliminary list is still well below the 172 parcels offered during 2020, a pandemic year, and we question why only 19 parcels in New Mexico have been selected for this sale out of the more than 400 that have been nominated in the state over the past several years. BLM has not provided a reason for the delay in processing these EOs and we request BLM process them for inclusion in upcoming quarterly lease sales.

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

¹ 30 U.S.C. § 226(b).

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) was correct and consistent with NEPA and legal precedent.

Western Energy Alliance welcomes New Mexico BLM's intent to conduct a May 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