

# JULANDER ENERGY COMPANY

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*Energy, Natural resources, the Environment*

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RECEIVED  
MARCH 10 2005

February 8, 2005

Jeremy Casterson  
Bureau of Land Management  
455 Emerson Street  
Craig, CO 81625

Dear Jeremy,

We appreciate the opportunity to provide the following comments on the Draft Analysis of the Management Situation (AMS). We recognize that your office has already made 200 comments to Booz Allen, and our comments may have already been incorporated into the document.

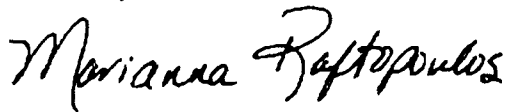
1. In the purpose and need section (1-1) under major issues to be addressed in the RMP revision the Canadian Lynx should not be listed. We agree with the need to support numerous wildlife species, but the habitat for Canadian Lynx should not be considered in the plan for the Little Snake RMP. The State of Colorado DOW set out a plan for reintroduction of the Lynx and distribution of the Lynx is in the southern portion of the state, Rio Grande County. Although Routt County Forest Plan lists the Routt National Forest as habitat for Canadian Lynx, we do not agree with extending the habitat for Lynx into the Little Snake Resource Area. That was not the intent of the Division of Wildlife with the reintroduction.
2. Valid Existing Rights should be listed as an issue and the overriding importance they have within the Resource Management Plan. Valid Existing Rights are oil and gas leases, right-of-way authorizations such as utility corridors, pipelines and power lines, valid mining claims, easements, grazing permits and private water rights.
3. Another major issue is protection of multiple use of public lands. Multiple use of public lands is an integral part of the custom and culture of Moffat County.
4. All local plans should be included in the AMS, including when completed the sage grouse management plan.
5. We recognize your comment that the socio-economic section was not complete. We ask the BLM with the cooperation of NWCOS to conduct a thorough socio-economic study to incorporate into this document. Several documents have already been completed and we ask for more analysis. We request that the 2005-2006 Community Indicators Project, the 2004 Economic Development Report, the Northwest Colorado Economic Reviews from the Associated Governments of Northwest Colorado be analyzed and incorporated into the AMS. In the economic section we would request an evaluation of the effect that increased oil and gas production would have on direct local employment, the tax base from royalties redistributed to Moffat County, and the increase in property tax revenues.

Pride in the Rockies

6. Page 4-6 under heading Energy and Mineral management it should be recognized that the demand for natural gas continues to grow significantly and we need to resolve issues in order to increase the supply.
7. Incorporate third party information-Information that was provided to your office by the oil and gas industry, the ranching community and others should be incorporated into this document or referenced in the AMS as to where this information is used in the BLM.

Thank you for your consideration of these issues. We appreciate the opportunity to comment.

Sincerely,



Marianna Raftopoulos  
Community and Government Relations Representative  
Julander Energy