

David A. Galt
Executive Director

July 13, 2007

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Dear Director Hagener:

MPA appreciates being on the mailing list for your recent position document on sage grouse, but at the same time the document raises major concerns about our ability to continue to develop Montana's oil and gas resources.

Your position document raised concerns in several areas. First, we are not clear on what FWP means when you say "unify field development as a means of dealing effectively with mixed mineral and surface ownership". We have worked extensively with the legislature's Environmental Quality Council in the last interim on split surface/mineral issues and feel it was dealt with in the 2007 session. I would be happy to review that process and the outcomes with you. In addition, there are several other items in your management approach that cause us concern.

Industry is well aware of efforts to list the sage grouse as a threatened or endangered species, which we agree is not in the best interest of Montana. We are also demonstrating our commitment to use best management practices to reduce the impact that our development has on the surface habitat. However, I think we all agree that development of domestic energy sources is of critical and vital interest to our nation and we need to continue to work together to mitigate concerns.

It was my understanding that the current management plan and conservation strategy for sage grouse was developed over a period of time with a broad group of stakeholders. This document looks final even though the last sentence of your letter speaks to working with "Plan partners" to modify the existing document. MPA is ready and willing to work with FWP and any other agencies to provide additional science and review the existing management plan. We appreciate your willingness to participate in industry initiated discussions and hope to advance meaningful solutions. We would suggest that bringing the original plan partners together again would be a good idea as well as continued discussion with our industry.

Jeff, I appreciate your willingness to work with us and would be receptive to your suggestions how best to proceed.

Kind Regards:

David A. Galt



Montana Fish, Wildlife & Parks

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David A Galt Executive Director
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Dear Mr. Dave Galt:

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Thank you for your correspondence concerning Montana Fish, Wildlife & Parks' (FWP) sage grouse position statement and the need to responsibly develop energy resources in Montana. FWP would be more than willing to discuss your Association's concerns and look forward to those conversations. As was pointed out in the document, work completed since the adoption of state sage grouse management plan and conservation strategy has demonstrated the inadequacy of existing stipulations in regards to oil and gas development and sage grouse conservation. FWP anticipates meeting with Plan partners later this summer to discuss this change in agency approach as well as recent modifications in the AHM harvest strategy. Your attendance at that session would be welcome.

Relative to your question concerning unified field development, FWP is looking for changes in approach to both exploration and development that reduce infrastructure needs (roads, powerlines, well densities, pipelines, etc.) across surface and subsurface jurisdictions and in a meaningful way, reduce impacts to sage grouse populations. This represents another step in the sequence of designating crucial conservation areas with no development, modifying stipulations to reduce observed impacts within developed fields, and phasing development so FWP can learn and move forward in a more informed manner.

It should also be noted that the discussions to date relative to responsible energy development have been sage grouse centric. This is understandable given the concern over the status of sage grouse populations on a range-wide basis and a potential listing under ESA. However, there are additional wildlife concerns that relate to big game species (mule deer and antelope) as well as prioritized Tier 1 species of concern as identified in the Comprehensive Fish and Wildlife Conservation Strategy. These resources are very important to the citizens of this state and the nation and development activities need to incorporate conservation strategies relevant to them.

FWP looks forward to meeting with MPA in August to discuss these issues.

Sincerely,


M. Jeff Hagener
Director