VIA EMAIL

February 21, 2020

Osage County Oil and Gas EIS
BIA Osage Agency
Attn: Superintendent Robin Phillips
P.O. Box 1539
Pawhuska, OK 74056

Re: *Osage County Oil and Gas Draft Environmental Impact Statement*

Dear Ms. Phillips:

Sooner Cattle Company ("SCC") operates a ranch in Osage County, Oklahoma. SCC supports implementation of the Enhanced Resource Protections outlined in Alternative 4 of the draft Environmental Impact Statement. Additionally, SCC believes Alternative 4 should include the following provisions:

a) Incorporate Best Management Practices (BMPs) into the Conditions of Approval (COAs).
b) Require BMPs at least as protective as those contained in BLM's Surface Operating Standards and Guidelines for Oil and Gas Exploration (i.e., the Gold Book).
c) Require producers/operators to execute surface damage agreements with landowners prior to entry.
d) Require producers/operators to remediate surface damage caused by oil and gas activities and restore the land back to tall grass prairie once oil and gas activities cease.
e) Establish enforceable limits and standards governing remediation of brine and petroleum contamination of soil and water.
f) Require that water wells near oil and gas activities must be tested and monitored for pollution.
g) Establish enforceable limits and standards governing venting and flaring of H_2S gas.

Further, additional COAs and enhanced environmental protections should always apply in sensitive environmental areas in Osage County, including, without limitation, all sensitive water supply streams, lakes and aquifers.

We appreciate BIA's time and efforts in considering SCC's comments concerning the draft Environmental Impact Statement.

Sincerely,

Tyson Johnson, Ranch Manager