Francis Craig

From: mosby.halterman@bia.gov on behalf of EIS, Osage County Oil and Gas <osagecountyoilandgaseis@bia.gov>
Sent: Friday, February 21, 2020 12:40 PM
To: Katie Patterson; Francis Craig
Subject: Fwd: [EXTERNAL] EISCOMMENTS
Attachments: EISCOMMENTS.docx

Mosby Halterman
Regional Environmental Scientist
Eastern Oklahoma Region, BIA
P.O. Box 8002
Muskogee, OK 74402-8002
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---------- Forwarded message ---------
From: **Ryan Jim** <jimr812@yahoo.com>
Date: Fri, Feb 21, 2020 at 11:12 AM
Subject: [EXTERNAL] EISCOMMENTS
To: osagecountyoilgaseis@bia.gov <osagecountyoilgaseis@bia.gov>
Cc: Ryan Jim <jimr812@yahoo.com>

James Ryan (Osage)

312 Larchmont

San Antonio, TX 78209

Mr. Mosby Halterman

Eastern Oklahoma Region BIA

P.O. Box 8002

Muskogee OK 74402

Dear Mr. Halterman,

I am an enrolled member of the Osage Nation and a Shareholder in the Osage Mineral Estate. I am sending you my comments on the proposed Environmental Statement Published by the BIA for Osage County. I would first like to address Alternatives 3 and 4. The BIA has a mandate to work for the benefit of the Osage Shareholders that is clearly defined in the Osage Allotment Act of 1906 and its amendments. Both Alternatives will reduce the Mineral Estate and are thereby at best improper and possibly illegal. The end result of implementing either will be legal action against the BIA.The inclusion of these intrusive and illegitimate Alternatives reinforces a continuing pattern by the BIA of putting the interest of the surface land owners above the interest of the shareholders of the Osage Mineral Estate. This must change.

The EIS fails to include the disastrous effects the draconian policies of the BIA in Osage County have had on new oil production and the drop in daily oil production since the meritless suit was filed in 2014 for surface land owners against the BIA and Osage County producers. Since 2014, the "non-CO2 daily oil production in Osage County has fallen from 14,266 BOPD to 8,279 BOPD", a 42% decline in production". Even when including the CO2 oil production, which has been a bright spot in this storm, total daily oil production has dropped to just over 10,000 BOPD., an approximate 28.5% decline in overall production.

One of the major causes of this decline in oil production is the failure of the Osage County BIA to issue new drilling, or workover permits in a timely fashion. IN FACT, they have issued very few new drilling, or makeover permits at all in the last five years. Before 2014, the average of new permits per year was 200. In the past five years, there have been fewer than 100 issued. In addition to causing a decline in daily production, this inaction will continue hurt oil production in the future for many years to come. These facts should be included in the EIS as they are a direct result of the overreaction of the BIA to the lawsuit and the stringent environmental policies put in place since 2014.

The Fish and Wildlife Service proposal to change the status of the American Burying Beetle from endangered to threatened will drastically change the scope of the EIS. This should immediately lessen the financial burdens now in place for producers to drill new wells and encourage new production in Osage County. This fact should be included even if this is not accomplished by time the EIS is published.

I would also like to mention that the BIA in Osage County has locked up well records that were previously available to producers for over 100 years. Producers cannot and will not drill new wells without this information. This is just another

example of the BIA in Osage County putting the interest of surface land owners above the interest of the shareholders of the Mineral Estate.

The result of all the above actions by the BIA in Osage County has been to drive away any new oil and gas business in Osage County and put many existing businesses in to bankruptcy. Whether intended, or not, these are the consequences. Please do you best to reverse this sad situation and restore a positive business climate in Osage County. The future and welfare of the Osage people depend on you to do the right thing.

Sincerely,

James Ryan (Osage)