



Department of the Interior | Bureau of Land Management | 1600 L Street, NW | Washington, DC 20504

Feb. 25th , 2013 Meeting

Ron Reed <rpreed6@sbcglobal.net>

Mon, Feb 25, 2013 at 8:32 PM

Reply-To: Ron Reed <rpreed6@sbcglobal.net>

To: "osageregneg@bia.gov" <osageregneg@bia.gov>

Eddie Streater,

Please list me for public comment on February 25th, 2013 starting at 2:30 p.m. cst. ASs you know we are in a snow blizzard and will have travel problems getting to meeting. rpr



Public Comment at Osage Negotiated Rulemaking Committee Meeting

Bob Hamilton <bhamilton@tnc.org>
To: "osageregneg@bia.gov" <osageregneg@bia.gov>

Mon, Feb 2

Mr. Eddie Streater,

I would like to register to speak during the public comment period in the afternoon session of the February 26, 2013 meeting of the Osage Negotiated Rulemaking Committee.

Thank you.

Bob Hamilton
Preserve Director

bhamilton@tnc.org
begin_of_the_skype_highlightinend_of_the_skype_highl(918) 440-9901 begin_of_the_skype_highlighting (Mobile)

nature.org

The Nature Conservancy
Tallgrass Prairie Preserve, OK
P.O. Box 458
Pawhuska, OK 74056





Osage Gearing

Tom Williams <twilliams@afsolutionsinc.com>
To: osageregneg@bia.gov

Mon, Feb 25, 2013 at 7:43 PM

I plan to attend and make a statement on the Rulemaking hearing tomorrow afternoon weather permitting. I understand the meeting will be delayed until 10 AM tomorrow February 26.

Thomas E. Williams

Sr. Advisor, Environmentally Friendly Drilling Program

510 Asbury Street

Houston, TX 77007

713 201 3866

twilliams@afsolutionsinc.com



25 CFR Part 226 Hearing

Ford Drummond <ford@drummondcattle.com>

Mon, Feb 25, 2013 at 7:25 PM

To: osageregneg@bia.gov

To Whom it may concern:

I would like the opportunity to make a public comment at the BIA hearing scheduled on 2/26/13 in Pawhuska.

Thank you,

—
Ford Drummond
ford@drummondcattle.com



SEARCH | REGISTER | CONTACT US

Register for Public Comment

John Hurd <john.hurd@retranches.com>
To: osageregneg@bia.gov

Mon, Feb 25, 2013 at 3:35 PM

Mr. Streater,

I am registering for public comment at the Negotiation Rule Making Session for the surface Issues that are currently set for 1:45 on February 26th.

John Hurd



[View this message in your inbox](#)

Tuesday comment period

Jeff Henry-Cross Timbers Land LLC <jeff@crosstimbersland.com>

Mon, Feb 25, 2013 at 9:09 AM

To: osageregneg@bia.gov

Eddie, I would like to register to speak during the public comment period Tue. afternoon. Would you please keep me up to date as to the weather issues and folks being able to fly in? Thanks,

Jeff Henry

Cross Timbers Land LLC

2006 N Lynn

Pawhuska, OK 74056

918-287-1996

jeff@crosstimbersland.com

www.crosstimbersland.com

No virus found in this message.

Checked by AVG - www.avg.com

Version: 2013.0.2899 / Virus Database: 2639/6123 - Release Date: 02/22/13



201302250512AM:MAIL:REG-INT:1302250512:1302250512

Corrected Copy

robertjackman@sbcglobal.net <robertjackman@sbcglobal.net>

Mon, Feb 25, 2013 at 5:12 AM

To: osageregnet@bia.gov

Cc: eroberts@cbuilding.org

To; Eddie Streater, Federal Officer / Osage NegReg Meetings'

Delete earlier copy - use attached corrected copy for Public Service Comment Section and inclusion in Federal Regsiter.

Thanks --Bob Jackman



Causes and.doc

43K

*To: Eddie Streater, Designated Federal Officer, BIA Osage Negotiated Rulemaking Committee;
Submitted comments for NegReg Public Comments section and Federal Register.*

Causes and Effects of Chronic Problems at BIA-Osage Agency & Solutions

For twenty five years BIA-Osage Agency has continuously been managed under fear, incompetence and indifference by its Superintendents with few exceptions. Paralleling were periods of good and bad Chiefs of The Osage Nation who were often misguided by BIA or turned blind eye to their failing BIA Trustees of the [now] \$4 Billion Osage Mineral Estate.

Estimate 95 % of current and past years of problems were not caused by obsolete Code of Federal Regulations [CFR] but by Superintendents not enforcing CFR rules and regulations, and not wisely using the enormous power and responsibility empowered to their office, or by applying it destructively rather than constructively. Most Superintendents were without any idea of their mission, and absent common business sense.

Common business sense is required to run daily operations jointly with permanent partners The Oil and Gas Industry and Land Owners, and understanding complexities in running the 1.47 million acres oil and gas mineral estate. (See below discussions on related land damage issues including pollution of land and land owner's waters.) To summarize: BIA - a failed Trustee with 'F' on land stewardship.

Personal observations over many years show BIA-Osage Agency's top management's mismanagement created atmosphere of - fear of reprisal, intimidation and favoritism, producing departmental bunker mentality with rank and file BIA employees at Pawhuska. Their mantra is don't question mismanagement acts, enforced by un-written code of ' Shut Up and Don't Report Wrongful Acts.' Resulting in few employees caring about job performance, low morale and often qualified and good conscientious BIA employees quitting or in some cases transferred out and or demoted.

And Federal Court awards show, BIA-Osage Agency also fails in its role of prudent financial trustee for individual Osage Tribal Members. Again the villain is not CFRs but long term broken management. Little positive can be said about its enablers at BIA-Muskogee and BIA Wash DC.

CFRs are not the main problem, and for those distant attorneys advocating that all can be corrected by tweaking CFRs - they do not know or understand the real problems which caused thousands of acres of surface land and ground water polluted. Plus testimony of experts in petroleum engineering and geological matters show; Osage Mineral Estate's oil and gas reserves orderly maximum beneficial development has suffered greatly by BIA's failures.

In addition to land owners harmed, oil and gas operators have in many cases been subject to costly moronic BIA-Osage Agency decisions, not based on CFRs, but on un-informed orders by BIA Superintendents and Supervisory Petroleum Engineer. Their attitude ' Leave - if you don' like it' and ' We don't care. '

Solutions:

1. Change BIA-Osage Agency's Superintendents Job Description to 'Senior Executive Service' [SEC] government grade with successful petroleum & land management experiences, and fill Asst. Superintendent Vacancy with person of similar background. Also.....

(A) Employ new qualified Supervisory Petroleum Engineer and Supervisory Petroleum Geologist.

(B) Add higher grade employees to correct all departments chronic understaffing.

(C) For Osage Mineral Estate's missing quality accounting & auditing, modernize with private sector software and proven systems.

2. Implement \$60-75 million Osage County wide Land Restoration and Plugging Project immediately, funded by BIA and Oklahoma Energy Resources Board (CERB) and EPA jointly for abandoned wells, equipment and site restoration. Costs estimate based research. Osage producers to voluntarily fund 'Osage County Site Restoration and Plugging Program' similar to other states' use of volunteer funding on their successful plugging and restoration programs, managed by Independent Boards and Management. See online examples of CERB, Oklahoma Marginal Well Commission and Pennsylvania's programs. Note: Osage County is not unique in having high numbers of abandoned and orphan wells; Pennsylvania has 12,005 abandoned and orphan wells, Oklahoma CERB has to date restored, plugged 12,200 damaged well sites with estimated 30,000 remaining. Google: Pennsylvania Dept. of Environmental Protection's 'Abandoned and Orphan Wells Program.'

3. BIA fund initial (repeat every 5 years) \$5 million estimated - *Study: Damaged Ground Water & Inventory of Surface and Ground Water Resources in Osage County.* Study by USGS & Oklahoma Geological Survey: Scope of Study:

(A) Determine land owner's ground water aquifers, alluvial and terrace deposits contaminated by BIA's failed oversight on petroleum industry activities.

(B) Inventory all surface and ground water resources in Osage County including depths of freshwater and blend-able brackish water.

Notes: Inventory of Ground Water resources important if drought continues. Important to all land owners, petroleum industry & Osage Shareholders. USGS studies available on Osage County; <http://toxics.usgs.gov/bib/bibPH2O.html> & <http://pubs.er.usgs.gov/publication/70031319>

4. Require big and small petroleum industry partner's representatives, and big and small ranchers & land owner's representatives officially seated, included in final approvals of any CFR new regulations, and recommendations selected by BIA Rulemaking Committee March 2013. Their omission violates NegReg's written statement for 'Fair & Balanced' committee.

5. BIA-Osage Agency & Osage Mineral Council joins as associate members;

(a) 'Interstate Oil & Gas Compact' (IOGCC –website www.iogcc.state.ok.gov) IOGCC assists member states to efficiently maximize oil and natural gas resources through sound regulatory practices while protecting our nation's health, safety and the environment. The Commission serves as the collective voice of member governors on oil & gas issues, advocates states' rights to govern petroleum resources within their borders.

(b) 'State Review of Oil & Natural Gas Environmental Regulations' (*STRONGER* – website www.strongerinc.org) 'Stronger' is collaboration process by review teams of members, stakeholders and communities to review oil & gas waste management programs agreed to by all participating parties. Workgroup's guidelines on air, land and water quality protection proven invaluable, US Dept. of Interior is associate member.

6.. Dangerous Condition Allowed by BIA on all Osage County Oil and Gas Leases: National Electrical Code not enforced, fix that before someone is electrocuted.

(Note; **Solutions** Items 1-6. Are common sense recommendations not requiring new or revisions to CFRs. Fact, 95% of problems caused by chronic under-staffing and poorly qualified or performing top management.)

7. CFR 226.10 Termination of Leases – Revision: Six month period of no documented production prior to taking any termination action. Then a show-cause letter or a meeting with clearly defined procedures to place the lease back in production or face termination. The meeting terms signed off on by the Superintendent and an oil company representative with signature authority to act in that capacity.

Bob Jackman, Geologist -- robertjackman@sbc.global.net 918 488 0107 February 25, 2013



mailto:DOIOASERE@NEG@osage.neg@bia.gov

Public Comment attached

robertjackman@sbcglobal.net <robertjackman@sbcglobal.net>

Sun, Feb 24, 2013 at 1:02 PM

To: osageregneg@bia.gov

Cc: Joe Abbott <joeabbott@windstream.net>, "US Sen. Coburn" <Brian_treat@coburn.senate.gov>, Rhonda Loftin <rhonda.loftin@bia.gov>, Vice.President@whitehouse.gov, luke_holland@inhofe.senate.gov, Lenzy Krehbiel-Burton <lenzykb@gmail.com>, Ray Tuttle <ray.tuttle@journalrecord.com>, Louise Red Corn <louise@bighearttimes.com>, Bob Sands <bsands@oeta.tv>, Rob Lyon <roblyonjr@att.net>, Jeff Henry-Cross Timbers Land LLC <jeff@crosstimbersland.com>, Warren Thomas <wjthomas@sullco.com>, Ray <raymcclain@cimtel.net>, Nona Roach <nroach@windstream.net>, Monica Dionisio <Monica.Dionisio@herouxlaw.com>, eddie.streater@bia.gov, starr.penland@bia.gov, nedra_darling@ios.doi.gov, galen.crum@galencrum.com, jayates@osage-tribe.com

To: Eddie Streater, Designated Federal Officer, BIA Osage Negotiated Rulemaking Committee:

Attached are comments to NegReg 'Public Comments Section' and **Federal Register**.

From: Robert 'Bob' Jackman - Tulsa Petroleum Geologist and Stakeholder in Osage County Oil and Gas properties.



Causes and.doc

42K

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Submitted comments for NegReg Public Comments section and Federal Register.*

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Osage producers voluntarily fund the 'Osage County Site Restoration and Plugging Program' similar to other states' use volunteer funding on their successful plugging and restoration programs, managed by Independent Boards and Management. See online examples of CERB, Oklahoma Marginal Well Commission and Pennsylvania's programs. Note: Osage County is not unique in having high numbers of abandoned and orphan wells; Pennsylvania has 12,005 abandoned and orphan wells, Oklahoma' CERB has to date restored, plugged 12,200 plus damaged well sites with estimated 30,000 remaining. Google: Pennsylvania Dept. of Environmental Protection's 'Abandoned and Orphan Wells Program.'

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Notes: Inventory of Ground Water resources important, should current drought continue. Important to ranchers, all land owners and petroleum industry plus Osage Shareholders. USGS has past valuable studies on Osage County.

4. Require big and small petroleum industry partner's representatives and big and small ranchers and land owner's representatives officially seated, included in final approvals of any CFR new regulations selected by BIA Rulemaking Committee March 2013. Their omission violates NegReg's written statement for 'Fair & Balanced' committee.

(Note; **Solutions'** Items 1-5. are common sense recommendations not requiring new or revisions to CFRs. It is established fact, 99% of problems caused by chronic under-staffing and poorly qualified or performing top management.)

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8. Dangerous Condition Allowed by BIA on all Osage County Oil and Gas Leases: National Electrical Code not enforced, fix that before someone is electrocuted.

Bob Jackman, Geologist -- Tulsa robertjackman@sbc.global.net 918 488 0107



mailto:OSAGE@REGNEG.bia.gov

RSVP for meeting in Pawhuska Feb 25,26,27

Johnson, Mary <Mary.Johnson@cepllc.com>
To: osageregneg@bia.gov

Fri, Feb 22, 2013 at 2:28 PM

I will be attending the Negotiated Rule Making meetings on the above dates.

Mary L. Johnson

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Register for 7th Public Mtg

Lindsey, Amy D. <Amy.Lindsey@encana.com>
To: "osagereg@bia.gov" <osagereg@bia.gov>

Thu, Feb 21, 2013 at 10:44 AM

Mr. Streater:

Please pre-register the following people for the 7th public meeting. Thank you.

Dan O'Toole

Encana Oil & Gas (USA) Inc.

5851 Legacy Circle

Plano, TX 75024

Ph# 469.304.6000

Amy Lindsey

Encana Oil & Gas (USA) Inc.

5851 Legacy Circle

Plano, TX 75024

Ph# 469.304.6000

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<http://www.encana.com>



Mailbox: (A) OSAGE COUNTY <osage@regneg.pawhuska.mn>

RegNeg Meetings Feb 25th - 27th

1:10:55 AM

robertjackman@sbcglobal.net <robertjackman@sbcglobal.net>

Wed, Feb 20, 2013 at 11:10 AM

To: osageregneg@bia.gov

To Eddie Streater, Federal Officer – RegNeg Committee Meetings

RegNeg Meeting at Pawhuska Feb – 25-27th :Please send agenda for all days. Need answer to question - is Monday's meeting a field trip as discussed for Osage County Cattlemen Assoc.

Regards – Bob Jackman



mailto:IA.OSAG@BISONCONNECT@windstream.net

Meetings

Nona Roach <nroach@windstream.net>

Mon, Feb 18, 2013 at 1:52 PM

To: osageregneg@bia.gov

I would like to attend the Feb 25th - 27th, 2013 meetings in Pawhuska and also the March 13th and 14th, 2013. Tony Muller will also be attending with me for the February meetings. Thank You!

—
Nona Roach Agape & Associates Inc PO Box 100 Avant, OK 74001 918-263-4011 or Cell 918-629-7267