



August 8, 2006

Carter Reid
Oil and Gas Team Leader
Bureau of Land Management
Fishlake National Forest
115 East 900 North
Richfield, UT 84701

Dear Mr. Reid:

The Western Business Roundtable ("Roundtable") respectfully submits the following comments regarding the Forest Service's ("Service") preparation of an Environmental Impact Statement (EIS) to document the analysis and disclose the environmental and human effects of oil and gas leasing on lands administered by the Fishlake National Forest. The Forest Service is required to evaluate National Forest System lands for potential oil and gas leasing by the Federal Onshore Oil and Gas Leasing Reform Act of 1987 ("FOOGLRA"). The Bureau of Land Management ("BLM"), as the agency responsible for lease issuance and administration, will participate as a cooperating agency.

Our membership is comprised of a coalition of CEOs and senior executives of corporations and organizations representing a broad cross-section of Western business interests – including those engaged in construction, manufacturing, mining, electric power generation and oil and gas exploration and development. Because our companies and their employees live and work in the West, we understand the importance of sensible environmental policy and economic development in the Western states.

We appreciate the opportunity to comment on the scope of the analysis for the draft environmental impact statement. This issue has tremendous macro-economic, consumer pocketbook, environmental and national security implications.

ROUNDTABLE'S POSITION

The Roundtable applauds the Service's recognition of the need to evaluate National Forest Service lands for potential oil and gas leasing. In light of increased demand for oil and gas, high prices, and discoveries of oil and gas reserves in other areas with similar geologic conditions, it is imperative that lands be made available to oil and gas leasing.

The economic consequences of maximizing the development of domestic oil and gas resources for the American citizen are enormous. New sources of oil and gas will help to

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The opinions expressed in this letter represent the views of a majority of Roundtable Members, but not necessarily all of our members.

bring down the skyrocketing prices that the average consumer is now forced to pay. The U.S. economy will also benefit through increased revenues and economic growth.

Beyond that, the Roundtable supports maximization of the environmentally-sound development of energy reserves on government-controlled lands as a means to reduce our nation's dependence on imported fuels from politically unstable areas of the world.

SPECIFIC ROUNDTABLE RECOMMENDATIONS

1. The EIS process should employ the best science and data to inform decision-making.

We understand that the EIS is an effective means to ensuring the environmentally-sound development of energy reserves on government-controlled lands. We believe that advances in drilling and extraction techniques have mitigated the impacts of such activities and, as a result, greatly increased the supply of responsibly-extractible resources. Thus, the forecast for development should be based on recent trends in energy supply, demand and pricing.

2. Input from affected entities should be given proper weight on the EIS

The EIS process requires that the Service consider the comments of interested and affected agencies, organizations and individuals. The Roundtable believes that public input is integral and that agencies need to give more consideration to those comments from entities that will actually be affected by a decision.

3. The EIS needs to include unbiased and comprehensive cost-benefit analysis.

An unbiased and comprehensive economic "cost-benefit" analysis should be performed. A key element of such analysis must be an explanation of the revenue that could be earned by making lands available for oil and gas development.

CONCLUSION

On behalf of the many member organizations of the Western Business Roundtable, thank you for the opportunity to comment on this important policy initiative, which is so important to the continued vitality of the West.

Sincerely,



Jim Sims
President and CEO

The Roundtable is a non-profit business trade association comprised of CEOs and senior executives of organizations doing business in the Western United States. Our member companies are involved in a broad range of industries, including agricultural products, accounting, chemicals, coal, construction and construction materials, conventional and renewable energy production, energy services, engineering, financial services, internet technologies, manufacturing, mining, oil and gas, pharmaceuticals, pipelines, telecommunications, and public and investor-owned utilities. We work for a common sense, balanced approach to economic development and environmental conservation, and we support public policies that encourage economic growth, opportunity and freedom of enterprise.