



Dear Friends,

Wyoming Bureau of Land Management (BLM) officials propose to ignore stacks of reports criticizing their management of federal coal and use a fast track, rubber stamp process to give away coal at rock bottom prices.

BLM wants to sell almost 16 million tons of coal to Cloud Peak Energy, a major exporter of Powder River Basin coal to Asian markets.

Remarkably, BLM proposes to approve the sale, known as the West Antelope II South lease modification (to expand the Antelope Coal Mine in Converse County), after a mere 14-day public notice and comment period.

Send your comments now! Deadline is Friday, April 4. (See below for talking points and a sample letter)

Urgent action is needed to tell local BLM officials in Wyoming and BLM Deputy Director Neil Kornze to slow down before giving away more public coal in a lease modification application (LMA) process that has earned scathing criticism from congressional overseers and the Department of Interior's own Inspector General.

The controversial lease modification loophole was expanded from 160 acres to 960 acres under the Energy Policy Act of 2005. Prior to that, the 856 acre lease proposal for West Antelope would have been ineligible for this kind of sweetheart deal.

Lease modification mismanagement cost taxpayers at least \$60 million, according to a report by the Interior Department's Inspector General in June 2013. And that \$60 million number was a lowball estimate, based on a spot check, not a comprehensive audit of all of the potential losses to the public as a result of BLM's normal procedures for approving LMAs.

And taxpayers could lose out even more if coal in this LMA is exported without BLM even considering that as a possibility. One major problem with the BLM's management is its failure to look at the growing sale of federal coal from the Powder River Basin to export markets.

Many federal coal sales have justified below market rates on the pretext that public coal supports energy security and affordable U.S. electric rates. That faulty market analysis results in massive subsidies to coal exports, a costly and dangerous extension of fossil fuel infrastructure that would pollute the globe for decades to come.

Please send your comments today. The deadline is this Friday, April 4.

A sample comment letter is copied below. You can also submit a comment letter via the [Western Organization of Resource Council's Action Page](#).

Information on the lease modification proposal and a link to the Environmental Assessment are available here: http://www.blm.gov/wy/st/en/info/news_room/2014/march/21hpdo-antelopemod.html

BLM Wyoming High Plains District
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Comments can be e-mailed to Casper_WYMail@blm.gov

Dear Mr. Wright,

I urge you to suspend further consideration of the West Antelope II South Lease Modification Application until the Bureau of Land Management has instituted needed reforms in its flawed and much criticized coal management program. Lease modifications have come under harsh criticism over the past year by no less than the Office of Inspector General of the Department of Interior. Many recommendations for reforming this faulty coal management practice are yet to be reviewed or implemented.

The environmental assessment on this 15 million ton coal lease was conducted without public notice or scoping and was published as a fait accompli online on March 21.

The rush to push this through is shocking in light of the growing and widespread criticism of BLM's handling of fair market value issues, particularly in relation to lease modifications. This narrow two-week window is the only opportunity for public comment on the significant fair market value issues related to lease modifications.

In June 2013, the Inspector General enumerated multiple problems contributing to the undervaluation of federal coal, several of them directly pointing to problems with lease modifications. Additional issues related to market evaluation, particularly the analysis of exports on federal coal valuation, were raised by the February report of the Government Accountability Office (GAO).

It is therefore imperative that the Wyoming BLM immediately suspend further action on this proposal until all of the issues raised by these auditors and inspectors can be fully reviewed, and recommendations for changes can be incorporated into the agencies' decision-making process.

Sincerely,
Your Name