



Holding Your Ground

A Citizen's Guide to Oil and Gas Leases



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Portions of this guide were adapted from previous Environment America Research & Policy Center and Frontier Group reports, including *Fighting Fracking: A Toolkit for Activists* (2016) and *Fracking by the Numbers* (2013). For a full text of these reports, as well as other helpful resources, please view the Additional Resources section at the end of this guide.

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Dear neighbor,

With over 460 documented oil and gas spills in Montana since 2015, it's no surprise that many of our local communities have mobilized to fight leases in their own backyard. Unfortunately, the oil and gas industry continues to push for development in places where drilling should never occur, including near Glacier National Park, Yellowstone National Park, and in Montana's High Divide.

Now more than ever, we need to be equipped to stand up against oil and gas development near our communities and in our wild lands. By educating people about oil and gas drilling's harms, and mobilizing our neighbors to take action, we can continue winning victories to protect our wild places, wildlife, and our outdoor heritage.

I hope this guide provides you with the resources you need to stand up for your favorite wild lands.

Sincerely,



Skye Borden
State Director, Environment Montana Research & Policy Center



Image caption: In 2018, residents in Livingston, MT, successfully fought oil and gas leases that were proposed outside of town. The drilling platforms would have been visible from downtown and from the riverfront. Photo credit: Small Axe Productions.

Impacts from Drilling

Oil and gas drilling on Montana public lands endangers our wildlife, contaminates our waterways, and threatens our outdoor recreation and our way of life. From habitat destruction to toxic wastewater and methane emissions, every aspect of the drilling process puts our public lands at risk.

Damaging habitat

Drilling transforms rural and natural areas into industrial zones. This development threatens national parks and national forests, damages the integrity of landscapes and habitats, and contributes to water pollution problems that threaten aquatic ecosystems.

Before drilling can begin, land must be cleared of vegetation and leveled to accommodate drilling equipment, gas collection and processing equipment, and vehicles. Additional land must be cleared for roads to the well site, as well as for any pipelines and compressor stations needed to deliver oil or gas to the market. Often, this development occurs on remote and previously undisturbed wild lands.

As oil and gas companies expand drilling on public lands, our national parks, national forests and other iconic landscapes are increasingly at risk:

- In 2018, an oil and gas lease bordering Montana's **Upper Missouri River Breaks National Monument** sold for just \$2 an acre, the minimum bid allowable.¹
- Despite federal attempts to retire decades-old leases in the Badger-Two Medicine area, which borders **Glacier National Park** and is considered sacred to

the Blackfeet Tribe, oil and gas developers continue to fight for the right to drill there.²

- Developers nominated oil and gas parcels outside of Livingston, just north of **Yellowstone National Park**, for lease in 2018.³

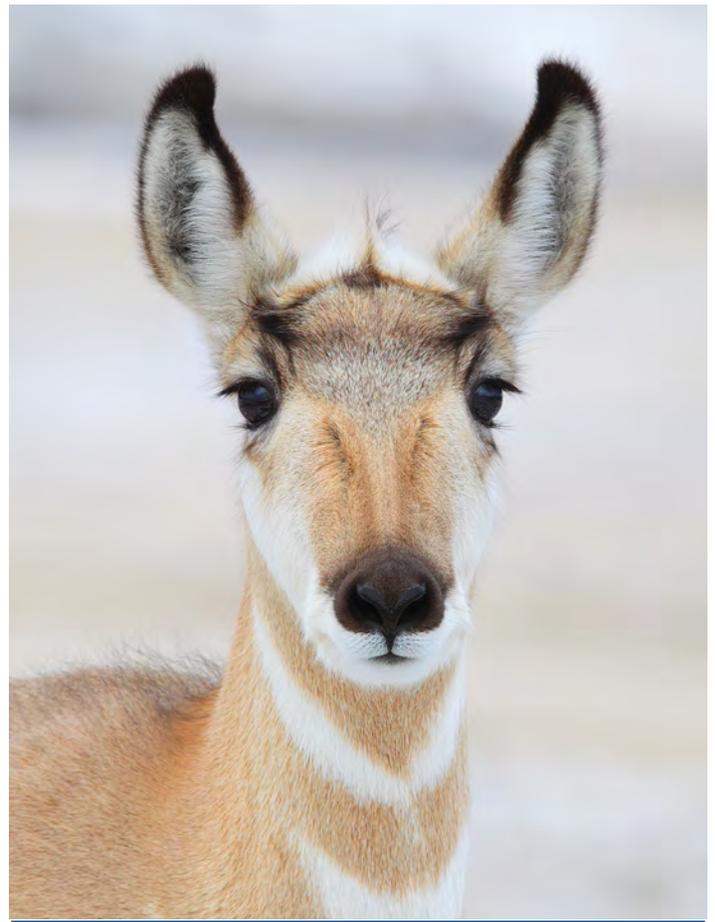


Image caption: Pronghorn antelope are one of many species that are negatively impacted by regional oil and gas development. Photo credit: Doug Dance for USFS via flickr.

The disruption and fragmentation of natural habitat can put wildlife at risk. In Wyoming, for example, extensive gas development in the Pinedale Mesa region has coincided with a significant reduction in the region's population of mule deer. A 2006 study found that the construction of well pads drove away female mule deer.⁴ The mule deer population in the area dropped by 36% from 2001 to 2016.⁵

Concerns have also been raised about the impact of gas development on pronghorn antelope. A study by the Wildlife Conservation Society documents an 82 percent reduction in high-quality pronghorn habitat in Wyoming's gas fields, which have historically been key wintering grounds.⁶

Birds may also be vulnerable, especially those that

depend on grassland or sagebrush habitat. An eight-year study of Montana and Wyoming sage grouse found that population growth inside gas development areas were less than half the rates in undisturbed areas. Roads, pipelines and well pads for drilling may fragment the sagebrush into segments too small to provide adequate habitat.⁸

The clearing of land for well pads, roads and pipelines may also threaten aquatic ecosystems by increasing sedimentation of nearby waterways and decreasing shade. A study by the Academy of Natural Sciences of Drexel University found an association between increased density of gas drilling activity and degradation of ecologically important headwater streams.⁹



Large image caption: Sage grouse have experienced significant population declines as a result of oil and gas development. Photo credit: Alan Krakauer via flickr.

Threatening human health

Oil and gas development causes a wide range of human health impacts, from contaminated drinking water to increased air pollution.

Drilling has polluted both groundwater and surface waterways such as rivers, lakes and streams. Drilling pollution can enter our waterways at several points in the process – including leaks and spills in drilling fluid, well blowouts, the escape of methane and other contaminants from the well-bore into groundwater, and the long-term migration of contaminants underground.

State data confirms that oil and wastewater spills are commonplace in Montana. Our research found that Montana experienced an average of 1 to 2 spills per week from 2015 to 2019.¹⁰ These incidents spilled a total of six million gallons of wastewater and 298,000 gallons of oil onto Montana land and waterways.

Air pollution from drilling threatens the health of people living and working close to the wellheads, as well as those far away. Children, the elderly and those with respiratory diseases are especially at risk.

Drilling produces air pollution from the well bore as the well is drilled and gas is vented or flared. Emissions and dust from trucks carrying water and materials to well sites, as well as from compressor stations and other fossil-fuel machinery, can also contribute to air pollution.¹¹

People who live close to drilling sites are exposed to a variety of air pollutants including volatile organic compounds (VOCs) such as benzene, xylene and toluene. These chemicals can cause a wide range of health problems – from eye irritation and headaches to asthma and cancer.¹²



Image caption: Montana averages 1-2 oil and gas spills every week from drilling platforms. Photo credit: Pheonix Law via flickr.

Contributing to climate change

Climate change is a profound threat to virtually every aspect of nature and human civilization – disrupting the functioning of ecosystems, increasing the frequency and violence of extreme weather, and ultimately jeopardizing health, food production, and water resources for Americans and people across the planet. Oil and gas extraction produces enormous volumes of climate change pollution.

Drilling's primary impact on the climate is through the release of methane, which is a far more potent contributor to global warming than carbon dioxide. Intentional venting and leaks during extraction, transmission and distribution of oil and gas also release substantial amounts of methane into the atmosphere. Over a 100-year timeframe, a pound of methane has 25 times the heat-trapping effect of a pound of carbon dioxide.¹³

Imposing costs on local communities

Oil and gas drilling disrupts local communities and imposes a wide range of immediate and long-term costs on them, from strained services to local business impacts.

As a result of the heavy use of publicly available infrastructure and services, drilling imposes both immediate and long-term costs on taxpayers.

The trucks required to deliver water to a single fracking well cause as much damage to roads as 3.5 million car journeys, putting massive stress on roadways and bridges not constructed to handle such heavy volumes of traffic.¹⁴

Drilling also strains public services. Increased heavy vehicle traffic has contributed to an increase in traffic accidents in drilling regions.¹⁵ In places with drilling booms, the influx of temporary workers can also put pressure on housing supplies, thereby causing social dislocation.

Governments may even be forced to clean up orphaned

wells – wells that were never properly closed and whose owners, in many cases, no longer exist as functioning business entities. Though oil and gas companies face legal responsibility to plug wells and reclaim drilling sites, they have a track record of leaving the public holding the bag.¹⁶

Drilling also imposes damage on the environment, public health and public infrastructure, with significant economic costs, especially in the long run after the initial rush of drilling activity has ended. A 2008 study by the firm Headwaters Economics found that Western counties that have relied on fossil-fuel extraction for growth are doing worse economically than their peers, with less-diversified economies, a less-educated workforce, and greater disparities in income.¹⁷

Explore more impacts

To learn more about the impacts of oil and gas drilling, check out the reports listed in the Additional Resources section at the end of this guide.



Large image caption: Truck traffic from a single drilling site causes as much road damage as 3.5 million car trips. Photo credit: Wild Earth Guardians via flickr.

Understanding the Process

The Bureau of Land Management (BLM) and U.S. Forest Service both have land use plans to determine which public land sections are eligible to be nominated for lease. Operators can nominate eligible parcels to be included in upcoming sales at any time.¹⁸

The BLM offers quarterly lease sales, although some sales may be canceled if there no eligible parcels have been nominated. Information on upcoming scheduled lease sales is posted on the Montana-Dakotas BLM website, but they usually take place in March, June, September and December.¹⁹

Parcels that are nominated, but not sold, may be purchased later through a process known as noncompetitive leasing. For more information on noncompetitive leases, please review the *Backroom Deals* report listed in the resources section of this guide.

Once an operator has purchased a valid lease, they have a contractual right to develop the parcels for oil and gas.²⁰ For this reason, the lease stage is the most important one for public participation, as it is rare for development permits to be denied in later stages.²¹

Signing up for notices

The BLM is required to provide notice 45 days before a lease sale.²² Although the different forms of “notice” used varied greatly in the past, almost all BLM offices now post notices online. Most field offices will also allow you to sign up to receive notifications via email or mail whenever there is an upcoming lease sale in your area. Call your local BLM office to learn what methods they use and ask if you can get on their notice mailing list.



Medium image caption: Oil and gas leases adjacent to the Upper Missouri River Breaks National Monument recently sold for just \$2 an acre. Photo credit: Bob Wick for BLM via flickr.

The notice for the lease sale will include a link to the sale’s BLM’s e-Planning web page. This page will include documents relating to the sale, including map files and the BLM’s environment assessment.

Generally, the BLM will accept written public comments only. For some leases, the BLM may also choose to hold public meetings or hearings where people can submit oral comments or testimony. Meeting dates will also be posted on the e-Planning site.

Commenting on a Lease

Although many groups submit longer, more technical comments, it isn't required. You don't need a law license or an ecology degree to effectively comment on a lease sale! If you are feeling intimidated by the process, aim to focus on two to three issues that you care the most about and leave the complicated legal analysis for other commenters.

Objections to lease sales generally fall into two categories: substantive and procedural. You may choose to include both categories into your comment or focus on substantive impacts only. Both categories are discussed in more detail below.

Substantive Issues

The BLM and Forest Service are required to consider a range of potential impacts to soils, water resources, air quality, visual quality, archeological or historical sites, and plants and wildlife.²³

Consider the proposed lease site when writing your comment. Is it near a town? If so, you may want to focus on human impacts, such as potential water and air quality degradation. Is it in a more remote area? Look at potential impacts to plants and wildlife, especially endangered or threatened species. Is it near an important outdoor recreation or cultural area? Consider writing about visual quality or impacts to historical sites.

The BLM's environmental assessment of the lease sale will be included in the documents tab of the e-Planning webpage. This document will provide the agency's review of potential environmental impacts for the sale. You can read this report and identify issues that seem

particularly important to you.

In the resources section of this guide, we have included a number of reports on oil and gas impacts you may also find useful. Consider citing data from these reports in your comment to support your specific concerns.

Procedural Issues

Both the Forest Service and the BLM are required to analyze the environmental impacts of their lease sale according to the National Environmental Protection Act (NEPA). Although the NEPA requirements may differ depending on the type of lease being sold, this process generally requires the government to create an analysis known as an environmental impact statement (EIS).

According to the report *Protecting Our Public Lands: A Citizen's Guide to Oil and Gas Leases*, the BLM and Forest Service will often rely on the EIS from their land management plans for NEPA compliance, instead of creating a new EIS for each sale. Because the plans are often decades old, the report authors note that "the public and activists should be ready to protest and challenge any lease issued without a new NEPA process."²⁴

The *Protecting Our Public Lands* report is included in the resources section of this guide. Consider using background information from this report, or consulting with a local nonprofit with more technical expertise, to assist you in making a procedural argument in your comment.

Sample substantive comment

Re: Public Comment on DOI-BLM-MT-0000-2018-0007-EA

To whom it may concern:

Anglers from all around the world travel to the Big Hole River region, just for the chance to spend a couple days along its Blue Ribbon trout streams. Clean, cold water, and the outdoor recreation that depends on it, are the lifeblood of this community. Oil and gas development jeopardizes this resource, and it isn't worth the risk.

I specifically protest the proposal to open any of the following parcels to oil or gas development, and I request that they be permanently withdrawn from any future lease sales: MTM 123456-XX, MTM 123456-YY and MTM 123456-ZZ.

Oil and gas development at these sites poses a threat to the water quality of the Big Hole River and its tributaries.

A recent report by Environment Montana Research & Policy Center (EMRPC) found that oil and gas accidents spilled nearly 300,000 gallons of oil and 6 million gallons toxic wastewater into Montana waterways in the past five years.¹

If a spill were to occur at the parcel along Willow Creek (MTM 123456-XX), or anywhere else in the watershed, the resulting impact could be devastating to the Big Hole River's trout habitat, as well as the guides, outfitters, other local businesses and residents that rely on the region's outdoor economy.

Development of the proposed leases will also destroy natural landscapes and directly impact their recreational value.

I also disagree with the Bureau's finding that the proposed leases will not directly impact recreational opportunities (EA, pg. 7). In particular, I am aware that at least two parcels (MTM 123456-YY and MTM 123456-ZZ) are used regularly as recreational land for hunting deer and antelope, and one parcel is located along a fishable tributary of the Big Hole River, Willow Creek (MTM 123456-XX).

As noted in EMRPC's "Fracking by the Numbers" report, well pads, new access roads, pipelines and other infrastructure built for drilling turn rural landscapes into industrial zones.² From 2005-2016, infrastructure to support drilling directly damaged at least 679,000 acres of land.³

As well pads, roads, pipelines and other gas infrastructure replace wildlands and farmland, the nation loses wildlife habitat and the remaining areas are increasingly fragmented and inhospitable to wildlife. For example, the mule deer population in Wyoming Pinedale Mesa declined 36% from 2001 to 2016, a period of extensive oil and gas development.⁴

The clearing of land for well pads, roads and pipelines may also threaten aquatic ecosystems by increasing sedimentation of nearby waterways and decreasing shade. A study by the Academy of Natural Sciences at Drexel University found an association between increased density of gas drilling activity and degradation of ecologically important headwater streams.⁵

Sample substantive comment (cont.)

Because of the damage that the drilling infrastructure causes to both upland and aquatic habitat, it is foreseeable that the hunting and fishing opportunities on these parcels will also be permanently impacted. This loss in recreational value should have been considered in the Bureau's environmental assessment.

Oil and gas development is not worth the risk.

The value of a pristine Big Hole River is worth far more than the fleeting value of the oil and gas we can extract from its watershed. By the Bureau's own estimate, the parcels listed have either a low or very low development potential (EA, pg. 12). Pushing forward with development on these parcels, despite the significant risks to the region's natural habitat, wildlife, and way of life, is not practical or economically sound.

For this reason, I respectfully ask for you to permanently withdraw these parcels from this and future sales. Thank you for your careful consideration of my comments.

Sincerely,

Amy Angler

Footnotes

1. Skye Borden, Environment Montana Research & Policy Center, "When You Drill, You Spill: 5 Years of Oil and Gas Accidents in Montana." 2019.
2. Elizabeth Riddlington, Frontier Group, and John Rumpler, Environment America Research & Policy Center, "Fracking by the Numbers: Key Impacts of Dirty Drilling at the State and National Level." 2013.
3. Ibid.
4. Hall Sawyer and Ryan Nielson, Western Ecosystems Technology, Inc., Mule Deer Monitoring in the Pinedale Anticline Project Area: 2016 Annual Report, prepared for the Pinedale Anticline Project office, 5 December 2016.
5. Academy of Natural History of Drexel University, Impacts of Marcellus Shale Natural Gas Development on Surface Waters. Accessed 7 April 2020.

Recruit Others to Comment

Now that you've written your own comment, you should recruit others to join you. This section reviews some common campaign tactics you can use to mobilize others in your community.

Build a coalition

Coalitions are an effective way to increase power by uniting groups toward shared goals. Having more groups and individuals involved in the lease process means more resources, more people, and more influence. Building a local coalition can be an effective way to fight a proposed lease near your community.

Some basic steps for forming a coalition include:

1. Use existing contacts that could be sympathetic to the cause, such as conservation groups, landowners associations, and outdoor recreation groups.
2. Educate the public in order to make new contacts. This can be done online via social media, knocking on doors in your community, or holding a house party for your friends and neighbors.
3. Reach out to all contacts you make in order to maintain their involvement with newsletters, emails, calls, or anything that continues to keep the issue on their minds.

Circulate a petition

Petitioning is a great way to generate additional signers for your comment against a proposed lease sale. Make sure your petition comment concisely explains your specific concerns about the lease and provides a clear

statement of your position. It should be a short, 2-3 sentence summary of your full comment (see the previous section for tips on writing comments).

It's a good idea to have your signers include their information so you can reach out to them in the future. But, be aware that all identifying information that you submit for comments may be made public. You may choose to include only signers' names and home towns when you submit the comments.

Consider creating both a hard copy version of the petition, which you can circulate at events, as well as a digital copy that you can link to in emails and social media posts. Google Forms is a good free tool to create digital petitions.

The sample petition comment below provides an outline that you can build off of, but be sure to tailor your comment to the particular lease.

Sample petition

The High Divide is one of America's largest intact ecosystems, and it's a critical landscape for many of Montana's threatened and endangered species. I am concerned that drilling in the Tendoy Mountains would disturb big game wintering habitat, destroy habitat for threatened and endangered species, and threaten the area's water resources with potential contamination from wastewater spills.

For this reason, I urge you to withdraw the following parcel from sale: MTM123456TD.

Email or phone bank your friends

Calling and emailing your members or friends is another effective way to build support. This tactic is especially helpful for generating additional sign-ons to a comment letter or for recruiting attendees for an upcoming event. If you have interested volunteers, consider holding a party where everyone phone-banks 20 people or sends 30 emails to friends.

Template phone bank script

Hi, can I please speak to (member or friend name)?

Hi, this is (your name), how are you?

I'm calling to talk about a proposed oil lease in the Big Hole near Dillon. Drilling turns wild places into industrial zones, with air pollution and truck traffic, and potential spills could impact the river. It isn't worth the risk.

I'm urging you to sign our comment opposing the lease. Will you join me to protect the Big Hole?

IF YES: Great, thank you so much! I really appreciate it. (follow up as needed – do you need additional info to sign their name to your comment petition?)

IF NO: Ok, thank you for your time.

Voicemail:

My name is (your name), and I want to keep drilling out of the Big Hole River valley. Drilling turns wild places into industrial zones, with air pollution and truck traffic, and potential spills could impact the river. I'm collecting comments to oppose a proposed oil and gas lease there, and I'd like you to sign on. (briefly provide event information or info on where they can find an online version of the petition)

Template email

Dear (member or friend),

I've lived outside of Glen for thirty years, and I'm concerned about a proposed oil and gas leases in the Big Hole River Valley. I'm writing to urge you to join me and submit a comment opposing the lease.

Drilling turns wild places into industrial zones, with air pollution and truck traffic, and potential spills could impact the river. It isn't worth the risk.

Like most folks in our community, we spend countless hours on the Big Hole every summer. I want to protect the river from drilling, and I hope you will join me by signing our online petition today: (add link to digital petition).

Sincerely,

(your name)

Write a letter to the editor

Submitting a letter to the editor of your local newspaper is another good way to educate other people in your community about a proposed lease.

In your letter be sure to have a hook. Keep it brief, stay on message, and read the rules (e.g. word limits, contact forms, and suggestions to get published). Lastly, it's a good idea to follow up with the opinion editor to be sure they received your letter and gauge if they would be interested in including it in the opinion section.

General format:

1. Connect to an article, real world event, or personal experience
2. Make one point
3. Back it up
4. End on your terms

Sample letter to the editor

Big Hole River fly-fishing brings thousands of tourists to our community each year and provides countless hours of summer fun for local families. That's why I was so disappointed to see part of the Big Hole River Valley included in the Bureau of Land Management's December oil and gas lease sale.

Trout need clean, cold water to survive, but drilling has been responsible for hundreds of toxic wastewater spills across Montana every year. What would happen to our river and our way of life if we had a big spill in the Big Hole?

Drilling simply isn't worth the risk.



Medium image caption: Rallies can be an effective way to demonstrate local opposition to an oil and gas lease. Photo credit: Rainforest Action Network via flickr.

Hold a rally or media event

Holding a rally or media event is a time-intensive, but effective, way to generate attention for your cause. This is an especially good tactic to use with other coalition partners because you can share the work.

First, you should determine what goal you want the event to accomplish. If it's demonstrating public support, make sure you have a plan to recruit enough participants to fill the event. If it's educating the public about the harms of drilling, you may want to plan a tour of the proposed lease site or visit someone whose business or home may be affected by the lease.

Whatever you decide, be sure to contact the media in order to get your event covered and make the necessary contacts with people who can help make your event a reality.

Use the following event planning checklist to organize your own event:

1. Plan the details of your event (who, what, where, when)
 - a. Make sure your location, visuals, and speakers reinforce your message
 - b. Decide what type of event is best
 - c. Choose a time that works for media and doesn't conflict with another event
 - d. Invite speakers and coordinate what they are saying and when
2. Share your event with friends and partners
 - a. Create a Facebook event
 - b. Send outreach emails to your network
 - c. Expect half of those invited to say yes and half of the yes's to show up
3. Invite the media
 - a. One week before, give reporters a heads up call or email before the advisory goes out
 - b. A few days before, write a press advisory and send to potential media
 - c. Call reporters to follow up
4. Day-of preparation
 - a. Make signs and print out materials
 - b. Get there early to set up and make sure speakers are there as well
5. Hold the event
 - a. Format: intro, speakers, conclude, Q&A
 - b. Memorize your intro and conclusion statements
 - c. Repeat your topline message often
 - d. Take pictures to share on social media
6. Follow-up with the media
 - a. Touch base with the reporters there
 - b. Email, call, or drop off materials to reporters who did not attend

Sample press advisory

Below is a sample outreach email that can be modified and sent to the media to draw their attention to your event. Make sure to follow up with them on the phone to make sure they are aware of the event and to check if they will be attending.

Subject: Keep the Tendoy's Wild Rally

Dear (recipient),

On March 3, we are standing up against oil and gas leases that threaten the Tendoy's. Join us in helping to protect these mountains from development. It's up to us to ensure that drilling doesn't harm our outdoor heritage and our way of life.

Join speakers X, Y, and Z as we highlight our concerns. Add your voice to the fight against oil and gas drilling at Lima City Park at 10am and help us stand up for our wild places!

What: Keep the Tendoy's Wild Rally

Where: Lima City Park, Lima, MT

When: March 3 at 10am

Who: Speakers X, Y and Z

RSVP here (link to Facebook event or other RSVP system)

Sincerely,

Riley Rancher

Phone: (406) 123-4567

Email: rileyrancher@gmail.com

Ask your decisionmakers to weigh in

It isn't necessary to get the support of local and state elected officials in opposing a lease, but it can be helpful. Local officials, such as county commissioners or mayors, as well as statewide elected officials, like the governor or federal legislators, can act as powerful allies and attract positive attention to your cause.

You will need to research which policymakers are your targets and learn about them in order to select a strategy they are likely to respond to. Identify those who will support your cause and which ones may be more hesitant; that way you will be able to tailor your approach to each individual.

In order to influence your targets, framing your cause based on what you know about them may be effective. If they are known for their leadership on the environment, showing the support of environmental organizations will be key. If they are particularly sensitive to the views of the medical community, organizing "grasstops" constituencies to oppose the lease such as doctors and nurses, could help influence your target.

In general, there are a couple ways you can reach out to a decisionmaker:

Call or email. Most elected officials will have a publicly listed email address and phone number. Before calling, write out a 2-3 sentence call script, so that you'll know exactly what you want to say.

Make a public statement. County commissioners and city councils have open meetings, and there is generally time set aside at each meeting for public comments. Come prepared with a short, 1-2 minute statement that expresses your concerns and asks your local decisionmakers for their support. If possible, stay to the end of the meeting to follow up with anyone who wants to follow up or ask questions.

Ask for a meeting. All our federal legislators have offices around the state, and their staff are generally willing to meet with constituents. This is a particularly good option if there are other community leaders, like health professionals or business leaders, that you can bring along with you to help make your case.

Meeting with decisionmakers

When you meet with a decisionmaker, be sure to have a specific ask. Do you want them to submit a comment, make a statement in a press release, or write an op-ed in the local paper? Clearly, but politely, ask for what you want and give them time to respond.

Always be courteous. Be sure to thank them for talking with you and for any past actions they have taken that you support.

For face to face meetings, dress appropriately. This is Montana ~ a suit isn't necessary! But business casual attire is generally recommended.

If they ask you a question, and you don't know the answer, admit that you don't know. Then, follow up after your conversation to provide an answer and any relevant additional information.

Additional Resources

Fracking by the Numbers

Elizabeth Riddlington, Frontier Group, and John Rumpler, Environment America Research & Policy Center, "Fracking by the Numbers: Key Impacts of Dirty Drilling at the State and National Level." 2013.

The Costs of Fracking

Tony Dudzik and Elizabeth Riddlington, Frontier Group, and John Rumpler, Environment America Research & Policy Center, "The Costs of Fracking: The Price Tag of Dirty Drilling's Environmental Damage." 2012.

When You Drill, You Spill

Skye Borden, Environment Montana Research & Policy Center, "When You Drill, You Spill: 5 Years of Oil and Gas Accidents in Montana." 2019.

Preserving Our Public Lands

Thomas F. Darin, Wyoming Outdoor Council, and Travis Still, Oil and Gas Accountability Project, "Preserving Our Public Lands: A Citizen's Guide to Understanding and Participating in Oil and Gas Decisions Affecting Our Public Lands." 2002.

The Climate Report 2020

The Wilderness Society, "The Climate Report 2020: Greenhouse Gas Emissions from Public Lands." 2020.

Backroom Deals

Kate Kelly, Jenny Rowland-Shea and Nicole Gentile, Center for American Progress, "Backroom Deals: The Hidden World of Noncompetitive Oil and Gas Leasing." 2019.

Fighting Fracking

Rachel Richardson and Korinna Garfield, Environment America Research & Policy Center, "Fighting Fracking: A Toolkit for Activists." 2016.



Large image caption: The Continental Divide Trail travels through BLM managed lands in Montana. Photo credit: Bob Wick for BLM via flickr.

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3. “Livingston Residents Protest BLM’s March Oil and Gas Lease Sale,” *Billings Gazette*. 11 January 2018.
4. Hall Sawyer, et al. “Winter Habitat Selection of Mule Deer Before and During Development of a Natural Gas Field,” *Journal of Wildlife Management*, 70(2): 396-403, 2006.
5. Hall Sawyer and Ryan Nielson, Western Ecosystems Technology, Inc., *Mule Deer Monitoring in the Pinedale Anticline Project Area: 2016 Annual Report*, prepared for the Pinedale Anticline Project office, 5 December 2016.
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8. *Ibid.*
9. Academy of Natural History of Drexel University, *Impacts of Marcellus Shale Natural Gas Development on Surface Waters*. Accessed 7 April 2020.
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