

[Attorney information for the States of Wyoming, Colorado, and Utah at pages 66-68]

IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF WYOMING

STATE OF WYOMING, STATE OF COLORADO,)
Petitioners,)

STATE OF NORTH DAKOTA, STATE OF UTAH,)
and UTE INDIAN TRIBE,)
Intervenor-Petitioners,)

vs.)

UNITED STATES DEPARTMENT OF THE)
INTERIOR; SALLY JEWELL, in her official)
capacity as Secretary of the Interior; UNITED)
STATES BUREAU OF LAND MANAGEMENT;)
and NEIL KORNZE, in his official capacity as)
Director of the Bureau of Land Management,)
Respondents,)

SIERRA CLUB, EARTHWORKS, WESTERN)
RESOURCE ADVOCATES, CONSERVATION)
COLORADO EDUCATION FUND, THE)
WILDERNESS SOCIETY, and SOUTHERN)
UTAH WILDERNESS ALLIANCE,)
Intervenor-Respondents.)

Case No. 2:15-CV-043-SWS (Lead Case)

CITATIONS TO THE RECORD IN SUPPORT OF WYOMING AND COLORADO'S MOTION FOR PRELIMINARY INJUNCTION



INDEPENDENT PETROLEUM)	
ASSOCIATION OF AMERICA, and)	
WESTERN ENERGY ALLIANCE,)	
)	
Petitioners,)	
)	
vs.)	Case No. 2:15-CV-041-SWS
)	
SALLY JEWELL, in her official capacity as)	
Secretary of the United States Department of the)	
Interior; and BUREAU OF LAND)	
MANAGEMENT,)	
)	
Respondents.)	

In accordance with the Court’s June 24, 2015, Order (Doc. 97), the States of Wyoming, Colorado, and Utah (States) submit the following citations to the administrative record in support of Wyoming and Colorado’s Motion for Preliminary Injunction (Doc. 32). The States have organized this document to reference sections of the memorandum in support of preliminary injunction (Doc. 32-1) followed by citations to documents within the record that support each specific point. The citations to the record include the starting Bates Stamp number for each record; the page number and pinpoint citation to specific information within that document that supports each argument; a document description, including the name of the submitter; and the disc number on which the record may be found.

In addition, the States note that the documents cited below are not necessarily the entire universe of documents in the record that the Court should consider during this litigation. Given that the administrative record contains approximately 988,328 pages of documents, the States may locate additional documents supporting their arguments on the

merits after the Court rules on their motion for preliminary injunction. And, given the breadth of the 331 page privilege log filed by the Respondents, the States may find additional relevant documents within that log that are currently unavailable to the States. Similarly, the States' review of the record thus far has been limited to those arguments raised in their motion. The States anticipate that they may present additional arguments for setting aside the rule at the merits stage, which may find support in portions of the record not identified below.

Section II(A)(i) - The Safe Drinking Water Act provides the states, Indian tribes, and the EPA with exclusive authority to regulate underground injections, including fracking.

In support of the argument that Congress granted the states, the tribes, and the Environmental Protection Agency (EPA) the sole authority to regulate **all** underground injections of fluids through the underground injection control (UIC) program and the Safe Drinking Water Act (SDWA) (Doc. 32-1, pp. 7–8), see the following documents in the record:

Document #	Page #	Pin cite	Document Description	Disc
DOIPS0000245	DOIPS0000247	Section 11	Industrial Energy Consumers of America - comment letter	1
DOIPS0008285	DOIPS0008302	1st paragraph	Black Hills Exploration and Production and Midstream LLC - comment letter	1
DOIPS0008717	DOIPS0008720	Section "water"	Office of the Governor, State of Wyoming - comment letter	1
DOIPS0010261	DOIPS0010263-64	Section "BLM lacks jurisdiction to regulate water quality and usage"	Board of Lincoln County Commissioners - comment letter	1

DOIPS0010389	DOIPS0010392-94	Section 3	Coalition of Local Governments - comment letter	1
DOIPS0010770	DOIPS0010771	1st paragraph	Join Minerals, Business & Economic Development Committee - Wyoming - comment letter	1
DOIPS0010821	DOIPS0010835-37	Section III D	America's Natural Gas Alliance, The American Exploration & Production Council & US Oil & Gas Assc. - comment letter	1
DOIPS0010821	DOIPS0010837	Section III E	America's Natural Gas Alliance, The American Exploration & Production Council & US Oil & Gas Assc. - comment letter	1
DOIPS0065448	DOIPS0065449	1st paragraph	Wyoming Department of Environmental Quality - comment letter	2
DOIPS0301182	DOIPS0301185	Last paragraph	Black Hills Exploration and Production and Midstream LLC - comment letter	4
DOIPS0301514	DOIPS0301517-18	Section 9	Industrial Energy Consumers of America - comment letter	4
DOIPS0365277	DOIPS0365307-08	Section X a.	Devon Energy Corporation - comment letter	5
DOIPS0389508	DOIPS0389512-14	Section 2.	Coalition of Local Governments - comment letter	5

Section II(A)(ii) - Subsequent judicial decisions and Congress's enactment of the 2005 Energy Policy Act have removed the EPA from the equation, leaving fracking regulation in the hands of the states.

In support of the argument that the Energy Policy Act of 2005 (EPAct) removed the vast majority of hydraulic fracturing activities from the purview of the SDWA and the UIC

program, and thus removed the regulation of hydraulic fracturing from the federal government(Doc. 32-1, pp. 9–10), see the following document in the record:

Document #	Page #	Pin cite	Document Description	Disc
DOIPS0301276	DOIPS0301276-77	Last paragraph	Office of the Governor, State of Wyoming - comment letter	4

Section II(A)(iii) - FLPMA charges the Bureau with general federal land use planning responsibility but does not authorize the Bureau to regulate fracking.

In support of the argument that the Federal Land Policy and Management Act (FLPMA) does not provide the Bureau of Land Management (Bureau) with the authority to regulate hydraulic fracturing for protection of the environment (Doc. 32-1, pp. 10–13), see the following documents in the record:

Document #	Page #	Pin cite	Document Description	Disc
DOIAR0028390	DOIAR0028391	Section "The BLM Lacks Authority"	Wyoming County Commissioners Association - comment letter	2
DOIPS0008723	DOIPS0008735-36	Section IV B	Devon Energy Corp. - comment letter	1
DOIPS0008723	DOIPS0008761	Section VIII A.	Devon Energy Corp. - comment letter	1
DOIPS0010389	DOIPS0010393-94	Last paragraph	Coalition of Local Governments - comment letter	1
DOIPS0010821	DOIPS0010835-37	Section III D	America's Natural Gas Alliance, The American Exploration & Production Council & US Oil & Gas Assc. - comment letter	1
DOIPS0010821	DOIPS0010837-38	Section III E & F	America's Natural Gas Alliance, The American Exploration & Production Council & US Oil & Gas Assc. - comment letter	1

DOIPS0301246	DOIPS0301252-54	Section I b.	American Petroleum Institute - comment letter	4
DOIPS0301276	DOIPS0301277	1st full paragraph	Office of the Governor, State of Wyoming - comment letter	4
DOIPS0365277	DOIPS0365307-08	Section X a.	Devon Energy Corporation - comment letter	5
DOIPS0389297	DOIPS0389298	1st & 2nd paragraphs	Mountain States Legal Foundation - comment letter	5
DOIPS0389508	DOIPS0389513-14	Last paragraph	Coalition of Local Governments - comment letter	5

Section II(A)(iv) - The Mineral Leasing Acts give the Bureau the authority to lease public land, not regulate fracking.

In support of the argument that the Mineral Leasing Act of 1920 (MLA) does not provide the Bureau with the authority to regulate hydraulic fracturing for protection of the environment (Doc. 32-1, pp. 13–14), see the following documents in the record:

Document #	Page #	Pin cite	Document Description	Disc
DOIPS0008723	DOIPS0008735-36	Section IV B	Devon Energy Corp. - comment letter	1
DOIPS0010821	DOIPS0010835-37	Section III D	America's Natural Gas Alliance, The American Exploration & Production Council & US Oil & Gas Assc. - comment letter	1
DOIPS0010821	DOIPS0010837-38	Section III E & F	America's Natural Gas Alliance, The American Exploration & Production Council & US Oil & Gas Assc. - comment letter	1
DOIPS0301276	DOIPS0301277	2nd full paragraph	Office of the Governor, State of Wyoming - comment letter	4
DOIPS0365277	DOIPS0365307-08	Section X a.	Devon Energy Corporation - comment letter	5

Section II(B) - Irreparable harm to the States will occur if the Court does not grant a preliminary injunction.

In support of the argument that implementation of the Bureau's hydraulic fracturing rule directly harms the States' sovereign authority (Doc. 32-1, pp. 16–17, 19–20), see the following documents in the record:

Document #	Page #	Pin cite	Document Description	Disc
DOIAR0028390	DOIAR0028390	2nd, 3rd, & 4th paragraphs	Wyoming County Commissioners Association - comment letter	2
DOIAR0028390	DOIAR0028391	1st paragraph & section "The BLM Lacks Authority"	Wyoming County Commissioners Association - comment letter	2
DOIPS0000181	DOIPS0000181	1st bulleted sentence	Western Energy Alliance - comment letter	1
DOIPS0000181	DOIPS0000182	2nd full paragraph	Western Energy Alliance - comment letter	1
DOIPS0000934	DOIPS0000934	7th paragraph	County of Lea, New Mexico - resolution opposing proposed rules for hydraulic fracturing	1
DOIPS0008077	DOIPS0008077	Entire page	Action 22 - comment letter	1
DOIPS0008308	DOIPS0008308	3rd paragraph	Stark County, North Dakota - comment letter	1
DOIPS0008706	DOIPS0008711	1st “–“ paragraph	Western Business Roundtable - comment letter	1
DOIPS0008717	DOIPS0008720	Section "water"	Office of the Governor, State of Wyoming - comment letter	1
DOIPS0008723	DOIPS0008735-36	Section IV B	Devon Energy Corp. - comment letter	1
DOIPS0008723	DOIPS0008736-38	Section IV C	Devon Energy Corp. - comment letter	1
DOIPS0008869	DOIPS0008871-72	Last 2 paragraphs	La Plata County Energy Council - comment letter	1

DOIPS0008959	DOIPS0008960	4th full paragraph	Utah Association of Counties - comment letter	1
DOIPS0008959	DOIPS0008961	1st, 2nd, and 3rd paragraphs	Utah Association of Counties - comment letter	1
DOIPS0008959	DOIPS0008963-64	Last two paragraphs	Utah Association of Counties - comment letter	1
DOIPS0010261	DOIPS0010263-64	Section "BLM lacks jurisdiction to regulate water quality and usage"	Board of Lincoln County Commissioners - comment letter	1
DOIPS0010389	DOIPS0010392-94	Section 3	Coalition of Local Governments - comment letter	1
DOIPS0010588	DOIPS0010588	1st paragraph	County of Dawson, Montana - comment letter	1
DOIPS0010651	DOIPS0010656-57	Section I C	Independent Petroleum Association of America & Western Energy Alliance - comment letter	1
DOIPS0010651	DOIPS0010672-79	Section III	Independent Petroleum Association of America & Western Energy Alliance - comment letter	1
DOIPS0010821	DOIPS0010833-34	Section III A	America's Natural Gas Alliance, The American Exploration & Production Council & US Oil & Gas Assc. - comment letter	1
DOIPS0010821	DOIPS0010836	1st full paragraph	America's Natural Gas Alliance, The American Exploration & Production Council & US Oil & Gas Assc. - comment letter	1
DOIPS0065374	DOIPS0065374	4th paragraph	Board of Laramie County Commissioners - comment letter	2
DOIPS0065374	DOIPS0065375	3rd & 4th paragraphs	Board of Laramie County Commissioners - comment letter	2

DOIPS0065378	DOIPS0065378	3rd paragraph	McCone County - comment letter	2
DOIPS0065382	DOIPS0065382	3rd bulleted sentence	Newfield Exploration Company - comment letter	2
DOIPS0065399	DOIPS0065399	3rd paragraph	Stark County, North Dakota - comment letter	2
DOIPS0065445	DOIPS0065445	2nd paragraph	Goshen County - comment letter	2
DOIPS0065512	DOIPS0065513	Last full paragraph	Wyoming Oil and Gas Conservation Commission - comment letter	2
DOIPS0065541	DOIPS0065541	1st bulleted sentence	Grand Junction Area Chamber of Commerce - comment letter	2
DOIPS0065561	DOIPS0065562	Last paragraph	Wyoming State Engineer's Office - comment letter	2
DOIPS0065651	DOIPS0065652	1st and last paragraphs	West Virginia Oil and Natural Gas Association - comment letter	2
DOIPS0065662	DOIPS0065662	2nd paragraph	Young, Steve - comment letter	2
DOIPS0065683	DOIPS0065693	2nd paragraph	Stewart, Cody - Energy Advisor to the Governor of Utah - comment letter	2
DOIPS0067047	DOIPS0067048	Paragraph labeled as "1")"	North Dakota Petroleum Council - comment letter	2
DOIPS0067047	DOIPS0067049	Paragraph labeled as "4")"	North Dakota Petroleum Council - comment letter	2
DOIPS0067241	DOIPS0067242	Paragraph labeled as "1")"	Slawson Exploration Company, Inc. - comment letter	2
DOIPS0067241	DOIPS0067243	Paragraph labeled as "4")"	Slawson Exploration Company - comment letter	2
DOIPS0138518	DOIPS0138518	2nd paragraph	Larsen, Lloyd - comment letter	2
DOIPS0301182	DOIPS0301184	Section 2 a.	Black Hills Exploration and Production and Midstream LLC - comment letter	4

DOIPS0365277	DOIPS0365278	Both bulleted paragraphs	Devon Energy Corporation - comment letter	5
DOIPS0365277	DOIPS0365279	3rd bulleted paragraph	Devon Energy Corporation - comment letter	5
DOIPS0365277	DOIPS0365284-85	Section III b.	Devon Energy Corporation - comment letter	5
DOIPS0365277	DOIPS0365307-08	Section X a. & b.	Devon Energy Corporation - comment letter	5
DOIPS0389297	DOIPS0389303	1st full paragraph	Mountain States Legal Foundation - comment letter	5
DOIPS0389508	DOIPS0389513	3rd full paragraph	Coalition of Local Governments - comment letter	5

In support of the argument that the States already regulate hydraulic fracturing adequately (Doc. 32-1, pp. 17–18, 24–25), see the following documents in the record:

Document #	Page #	Pin cite	Document Description	Disc
DOIAR0014055	DOIAR0014055	1st & 2nd paragraphs	Office of the Governor, State of Wyoming - comment letter	1
DOIAR0028390	DOIAR0028390	2nd paragraph	Wyoming County Commissioners Association - comment letter	2
DOIAR0028390	DOIAR0028391	Last paragraph	Wyoming County Commissioners Association - comment letter	2
DOIAR0028390	DOIAR0028394	1st paragraph	Wyoming County Commissioners Association - comment letter	2
DOIAR0040071	DOIAR0040072	1st paragraph	Office of the Governor, State of Wyoming - comment letter	2
DOIAR0043104	DOIAR0043104	1st paragraph	Office of the Governor, State of Wyoming - comment letter	2

DOJAR0051035	DOJAR0051058-61	Entire pages	Devon Energy Corporation - comment letter	2
DOJAR0057065	DOJAR0057065	Last paragraph	Select Committee on Federal Natural Resource Management - Wyoming - comment letter	3
DOJAR0074389	DOJAR0074390	1st full paragraph	New Mexico Oil Conservation Division - comment letter	3
DOJAR0102668	DOJAR0102728	Last paragraph of 2nd column, extending to the 3rd column	80 Fed. Reg. 16128 - Final Agency Rule on Hydraulic Fracturing	4
DOIPS0000181	DOIPS0000182	1st full paragraph	Western Energy Alliance - comment letter	1
DOIPS0000181	DOIPS0000183	2nd full paragraph	Western Energy Alliance - comment letter	1
DOIPS0000200	DOIPS0000201	4th paragraph	Western Energy Alliance - comment letter	1
DOIPS0000216	DOIPS0000216	Last paragraph	American Exploration and Production Council - comment letter	1
DOIPS0000245	DOIPS0000245	1st paragraph	Industrial Energy Consumers of America - comment letter	1
DOIPS0000616	DOIPS0000617	2nd full paragraph	Railroad Commission of Texas - comment letter	1
DOIPS0000631	DOIPS0000631	2nd paragraph	Yates Petroleum Corp. - comment letter	1
DOIPS0000631	DOIPS0000632	2nd full paragraph	Yates Petroleum Corp. - comment letter	1
DOIPS0000631	DOIPS0000633-35	Section "Effective State and Federal HF regulations are already in place"	Yates Petroleum Corp. - comment letter	1
DOIPS0000692	DOIPS0000692	1st paragraph	Big Horn County, Office of County Commissioners - comment letter	1
DOIPS0000692	DOIPS0000693	1st & 2nd full paragraphs	Big Horn County, Office of County Commissioners - comment letter	1

DOIPS0000697	DOIPS0000697	1st paragraph	Board of Commissioners, Rio Blanco County - comment letter	1
DOIPS0000697	DOIPS0000698	1st paragraph	Board of Commissioners, Rio Blanco County - comment letter	1
DOIPS0000906	DOIPS0000906	2nd paragraph	Washington County Commissioners - comment letter	1
DOIPS0000910	DOIPS0000910	3rd paragraph	Lincoln County, Nevada, Board of County Commissioners - comment letter	1
DOIPS0000934	DOIPS0000934	2nd paragraph	County of Lea, New Mexico - resolution opposing proposed rules for hydraulic fracturing	1
DOIPS0000942	DOIPS0000942	1st paragraph	Board of Carbon County Commissioners - comment letter	1
DOIPS0008077	DOIPS0008077	Entire page	Action 22 - comment letter	1
DOIPS0008141	DOIPS0008141	Section "Wyoming State Rules"	Sweetwater County Board of County Commissioners - comment letter	1
DOIPS0008201	DOIPS0008201	1st paragraph	Clute Oil Corp. - comment letter	1
DOIPS0008285	DOIPS0008286-87	Section 2	Black Hills Exploration and Production and Midstream LLC - comment letter	1
DOIPS0008285	DOIPS0008302	Conclusion #2	Black Hills Exploration and Production and Midstream LLC - comment letter	1
DOIPS0008308	DOIPS0008308	2nd paragraph	Stark County, North Dakota - comment letter	1
DOIPS0008308	DOIPS0008309	3rd full paragraph	Stark County, North Dakota - comment letter	1
DOIPS0008706	DOIPS0008708	Section "BLM's rule will exact heavy regulatory costs on the west", 1st paragraph	Western Business Roundtable - comment letter	1

DOIPS0008706	DOIPS0008712	1st “–“ paragraph	Western Business Roundtable - comment letter	1
DOIPS0008717	DOIPS0008717-18	Last paragraph	Office of the Governor, State of Wyoming - comment letter	1
DOIPS0008717	DOIPS0008718	1st full paragraph	Office of the Governor, State of Wyoming - comment letter	1
DOIPS0008723	DOIPS0008723-24	Section "The BLM rule ignores state primacy as it:"	Devon Energy Corp. - comment letter	1
DOIPS0008723	DOIPS0008728-30	Section III	Devon Energy Corp. - comment letter	1
DOIPS0008723	DOIPS0008731	Section IV A	Devon Energy Corp. - comment letter	1
DOIPS0008723	DOIPS0008735	Section IV A 5.	Devon Energy Corp. - comment letter	1
DOIPS0008723	DOIPS0008800	3rd bulleted paragraph & following paragraph	Devon Energy Corp. - comment letter	1
DOIPS0008723	DOIPS0008802	1st paragraph	Devon Energy Corp. - comment letter	1
DOIPS0008723	DOIPS0008804	2nd paragraph	Devon Energy Corp. - comment letter	1
DOIPS0008723	DOIPS0008806	3rd paragraph	Devon Energy Corp. - comment letter	1
DOIPS0008723	DOIPS0008807	1st full paragraph	Devon Energy Corp. - comment letter	1
DOIPS0008723	DOIPS0008808	3rd & 4th paragraphs	Devon Energy Corp. - comment letter	1
DOIPS0008723	DOIPS0008810	1st paragraph	Devon Energy Corp. - comment letter	1
DOIPS0008821	DOIPS0008822	5th paragraph	Haliburton Energy Services, Inc. - comment letter	1
DOIPS0008821	DOIPS0008823	3rd full paragraph	Haliburton Energy Services, Inc. - comment letter	1
DOIPS0008821	DOIPS0008827-30	Section III A.	Haliburton Energy Services, Inc. - comment letter	1
DOIPS0008869	DOIPS0008869-70	Last two paragraphs	La Plata County Energy Council - comment letter	1

DOIPS0008869	DOIPS0008872-73	Last paragraph	La Plata County Energy Council - comment letter	1
DOIPS0008959	DOIPS0008960	3rd paragraph	Utah Association of Counties - comment letter	1
DOIPS0008959	DOIPS0008963	2nd full paragraph	Utah Association of Counties - comment letter	1
DOIPS0008959	DOIPS0008964-65	Last paragraph	Utah Association of Counties - comment letter	1
DOIPS0008959	DOIPS0008967-68	Last paragraph	Utah Association of Counties - comment letter	1
DOIPS0009100	DOIPS0009100	3rd paragraph	Grosskopf, Loren - Park County Commissioner - comment letter	1
DOIPS0009115	DOIPS0009115	Last paragraph	Club 20 - comment letter	1
DOIPS0010261	DOIPS0010262-63	Section "State Fracking Laws Sufficient"	Board of Lincoln County Commissioners - comment letter	1
DOIPS0010389	DOIPS0010391-92	Section 2	Coalition of Local Governments - comment letter	1
DOIPS0010569	DOIPS0010571	1st full paragraph	Petroleum Association of Wyoming - comment letter	1
DOIPS0010588	DOIPS0010588	2nd & 3rd paragraphs	County of Dawson, Montana - comment letter	1
DOIPS0010651	DOIPS0010655-56	Section I B	Independent Petroleum Association of America & Western Energy Alliance - comment letter	1
DOIPS0010700	DOIPS0010703	1st full paragraph	American Petroleum Institute - comment letter	1
DOIPS0010708	DOIPS0010708	4th paragraph	Addendum to American Petroleum Institute - comment letter	1
DOIPS0010770	DOIPS0010770	3rd paragraph	Join Minerals, Business & Economic Development Committee - Wyoming - comment letter	1

DOIPS0010821	DOIPS0010822	Last paragraph	America's Natural Gas Alliance, The American Exploration & Production Council & US Oil & Gas Assc. - comment letter	1
DOIPS0010821	DOIPS0010823	1st paragraph	America's Natural Gas Alliance, The American Exploration & Production Council & US Oil & Gas Assc. - comment letter	1
DOIPS0010821	DOIPS0010823-24	Last paragraph	America's Natural Gas Alliance, The American Exploration & Production Council & US Oil & Gas Assc. - comment letter	1
DOIPS0010974	DOIPS0010976-77	Only paragraph	Permian Basin Petroleum Association - comment letter	1
DOIPS0010974	DOIPS0010978	2nd full paragraph	Permian Basin Petroleum Association - comment letter	1
DOIPS0010974	DOIPS0010980-81	Section 3162.3-3(c)(2)	Permian Basin Petroleum Association - comment letter	1
DOIPS0010974	DOIPS0010983	Section 3162.3-3(c)(6)	Permian Basin Petroleum Association - comment letter	1
DOIPS0010974	DOIPS0010984	Section 3162.3-3(c)(6)(ii) & (iii)	Permian Basin Petroleum Association - comment letter	1
DOIPS0010974	DOIPS0010986-87	Section 3162.3-3(f)	Permian Basin Petroleum Association - comment letter	1
DOIPS0011028	DOIPS0011028	3rd bulleted paragraph & the following paragraph	Republican Attorneys General Association & Republican Governors Association - comment letter	1
DOIPS0065344	DOIPS0065344	2nd paragraph	Phillips County Commissioners - comment letter	2

DOIPS0065348	DOIPS0065348	1st paragraph	Montana Association of Oil, Gas & Coal Counties - comment letter	2
DOIPS0065352	DOIPS0065352	1st & 3rd paragraph	Jankovsky, Tom - Garfield County Commissioner - comment letter	2
DOIPS0065362	DOIPS0065362	3rd paragraph	Seeley, Lenard - Weston County Commissioner - comment letter	2
DOIPS0065366	DOIPS0065366	2nd paragraph	Bruce, Tom - Weston County Commissioner - comment letter	2
DOIPS0065370	DOIPS0065370	Last paragraph	Ertman, Martha L. - Weston County Commissioner - comment letter	2
DOIPS0065374	DOIPS0065374	2nd & 4th paragraphs	Board of Laramie County Commissioners - comment letter	2
DOIPS0065378	DOIPS0065379	1st paragraph	McCone County - comment letter	2
DOIPS0065399	DOIPS0065399	2nd paragraph	Stark County, North Dakota - comment letter	2
DOIPS0065441	DOIPS0065441-42	Last paragraph	Washakie County Commissioners - comment letter	2
DOIPS0065445	DOIPS0065445	1st paragraph	Goshen County - comment letter	2
DOIPS0065512	DOIPS0065512	2nd paragraph	Wyoming Oil and Gas Conservation Commission - comment letter	2
DOIPS0065512	DOIPS0065515-23	Matrix of statue comparison	Wyoming Oil and Gas Conservation Commission - comment letter	2
DOIPS0065596	DOIPS0065597	1st full paragraph	Strata Production Company - comment letter	2
DOIPS0065646	DOIPS0065646	Paragraph labeled as "1."	Petro-Hunt LLC - comment letter	2
DOIPS0065646	DOIPS0065647	Paragraph labeled as "2."	Petro-Hunt LLC - comment letter	2
DOIPS0065662	DOIPS0065662	2nd paragraph	Young, Steve - comment letter	2

DOIPS0065683	DOIPS0065683	1st paragraph	Stewart, Cody - Energy Advisor to the Governor of Utah - comment letter	2
DOIPS0065683	DOIPS0065685-86	Last two paragraphs	Stewart, Cody - Energy Advisor to the Governor of Utah - comment letter	2
DOIPS0065683	DOIPS0065693	2nd paragraph	Stewart, Cody - Energy Advisor to the Governor of Utah - comment letter	2
DOIPS0065683	DOIPS0065695	2nd paragraph	Stewart, Cody - Energy Advisor to the Governor of Utah - comment letter	2
DOIPS0065712	DOIPS0065712	2nd paragraph	Perkins, Drew - Wyoming State Senator - comment letter	2
DOIPS0065755	DOIPS0065756	2nd paragraph	Carbon County - comment letter	2
DOIPS0065755	DOIPS0065757	1st paragraph	Carbon County - comment letter	2
DOIPS0065759	DOIPS0065760	1st & 4th paragraphs	Mesa County, Colorado, Board of County Commissioners - comment letter	2
DOIPS0065764	DOIPS0065765	3rd & 8th paragraphs	New Mexico Oil & Gas Association - comment letter	2
DOIPS0066528	DOIPS0066529-31	Section "Effective State HF Regulations are already in place"	Gene R. George & Associates, on behalf of Yates Petroleum Corp. - comment letter	2
DOIPS0067101	DOIPS0067101	Section "Wyoming State Rules"	Sweetwater County Board of County Commissioners - comment letter	2
DOIPS0067101	DOIPS0067102	Section "Rule Inconsistencies and Duplication"	Sweetwater County Board of County Commissioners - comment letter	2
DOIPS0067241	DOIPS0067241-42	Last paragraph	Slawson Exploration Company - comment letter	2
DOIPS0067241	DOIPS0067244	1st paragraph	Slawson Exploration Company - comment letter	2
DOIPS0072015	DOIPS0072015	2nd paragraph	Montezuma County Board of County	2

			Commissioners - comment letter	
DOIPS0138518	DOIPS0138518	3rd paragraph	Larsen, Lloyd - comment letter	2
DOIPS0178933	DOIPS0178935-37	Section "States are regulating hydraulic fracturing effectively"	Independent Petroleum Association of America & Western Energy Alliance - comment letter	3
DOIPS0179033	DOIPS0179033	3rd paragraph	Encana Oil & Gas - comment letter	3
DOIPS0179186	DOIPS0179188	1st full paragraph	Petroleum Association of Wyoming - comment letter	3
DOIPS0179186	DOIPS0179193-94	Last paragraph	Petroleum Association of Wyoming - comment letter	3
DOIPS0301182	DOIPS0301184	Section 2 b.	Black Hills Exploration and Production and Midstream LLC - comment letter	4
DOIPS0301201	DOIPS0301201	1st paragraph	Wyoming Oil and Gas Conservation Commission - comment letter	4
DOIPS0301237	DOIPS0301239	1st full paragraph	Domestic Energy Producers Alliance - comment letter	4
DOIPS0301246	DOIPS0301254-56	Section I c.	American Petroleum Institute - comment letter	4
DOIPS0301276	DOIPS0301276-77	Last paragraph	Office of the Governor, State of Wyoming - comment letter	4
DOIPS0301276	DOIPS0301278	2nd paragraph	Office of the Governor, State of Wyoming - comment letter	4
DOIPS0301298	DOIPS0301298	2nd paragraph	National Association of Manufacturers - comment letter	4
DOIPS0301298	DOIPS0301301-02	Paragraph labeled as "2."	National Association of Manufacturers - comment letter	4
DOIPS0301514	DOIPS0301516	Section 3	Industrial Energy Consumers of America - comment letter	4

DOIPS0301514	DOIPS0301517	Section 4	Industrial Energy Consumers of America - comment letter	4
DOIPS0301566	DOIPS0301568-71	Sections I. & I.A.	America's Natural Gas Alliance & The American Exploration & Production Council - comment letter	4
DOIPS0365245	DOIPS0365255-56	Section II B.	Haliburton Energy Services Inc. - comment letter	5
DOIPS0365277	DOIPS0365277-78	Last paragraph	Devon Energy Corporation - comment letter	5
DOIPS0365277	DOIPS0365278	Entire page	Devon Energy Corporation - comment letter	5
DOIPS0365277	DOIPS0365282-84	Section II a., b., & c.	Devon Energy Corporation - comment letter	5
DOIPS0365277	DOIPS0365284-85	Section III b.	Devon Energy Corporation - comment letter	5
DOIPS0365277	DOIPS0365311-12	Section XII	Devon Energy Corporation - comment letter	5
DOIPS0389307	DOIPS0389307	2nd & 3rd paragraphs	New Mexico Oil & Gas Association - comment letter	5
DOIPS0389508	DOIPS0389509-10	Last paragraph	Coalition of Local Governments - comment letter	5
DOIPS0389508	DOIPS0389510	1st full paragraph	Coalition of Local Governments - comment letter	5
DOIPS0435703	DOIPS0435704	2nd, 3rd, & 4th paragraphs	Wyoming County Commissioners Association - comment letter	5
DOIPS0435703	DOIPS0435705	Last full paragraph	Wyoming County Commissioners Association - comment letter	5
DOIPS0435725	DOIPS0435726	2nd full paragraph	ExxonMobil - comment letter	5

DOIPS0435737	DOIPS0435737	2nd paragraph	Office of the Governor, State of Montana - comment letter	5
DOIPS0435877	DOIPS0435877	3rd paragraph	Hoeven, John; Heitkamp, Heidi; Cramer, Kevin - comment letter	5

In support of the argument that implementation of the Bureau's hydraulic fracturing rule will result in a duplication of state effort without a measurable environmental benefit (Doc. 32-1, p. 18), see the following documents in the record:

Document #	Page #	Pin cite	Document Description	Disc
DOIAR0014055	DOIAR0014055	2nd paragraph	Office of the Governor, State of Wyoming - comment letter	1
DOIAR0028390	DOIAR0028391	2nd paragraph	Wyoming County Commissioners Association - comment letter	2
DOIAR0028390	DOIAR0028392	5th full paragraph	Wyoming County Commissioners Association - comment letter	2
DOIAR0028390	DOIAR0028394	1st paragraph	Wyoming County Commissioners Association - comment letter	2
DOIAR0043104	DOIAR0043104	1st & 2nd paragraphs	Office of the Governor, State of Wyoming - comment letter	2
DOIAR0055854	DOIAR0055854	1st paragraph	Wyoming Congressional Delegation - comment letter	3
DOIAR0057065	DOIAR0057065	Last paragraph	Select Committee on Federal Natural Resource Management - Wyoming - comment letter	3
DOIAR0057065	DOIAR0057066	1st paragraph	Select Committee on Federal Natural Resource Management - Wyoming - comment letter	3

DOIAR0074389	DOIAR0074390	1st full paragraph	New Mexico Oil Conservation Division - comment letter	3
DOIPS0000181	DOIPS0000181	1st bulleted sentence	Western Energy Alliance - comment letter	1
DOIPS0000181	DOIPS0000181-82	Last paragraph	Western Energy Alliance - comment letter	1
DOIPS0000181	DOIPS0000182	1st full paragraph	Western Energy Alliance - comment letter	1
DOIPS0000197	DOIPS0000197	3rd paragraph	America's Natural Gas Alliance - comment letter	1
DOIPS0000216	DOIPS0000216	2nd paragraph	American Exploration and Production Council - comment letter	1
DOIPS0000216	DOIPS0000217	1st paragraph	American Exploration and Production Council - comment letter	1
DOIPS0000245	DOIPS0000245	1st paragraph	Industrial Energy Consumers of America - comment letter	1
DOIPS0000245	DOIPS0000247	Section 11	Industrial Energy Consumers of America - comment letter	1
DOIPS0000300	DOIPS0000304	Section "Additional Comments" - 1st & 3rd paragraphs	Industrial Commission of North Dakota - comment letter	1
DOIPS0000616	DOIPS0000617	2nd full paragraph	Railroad Commission of Texas - comment letter	1
DOIPS0000616	DOIPS0000619-20	Last paragraph	Railroad Commission of Texas - comment letter	1
DOIPS0000616	DOIPS0000620	First full paragraph	Railroad Commission of Texas - comment letter	1
DOIPS0000631	DOIPS0000631-32	Last two paragraphs	Yates Petroleum Corp. - comment letter	1
DOIPS0000631	DOIPS0000635	Last 2 paragraphs	Yates Petroleum Corp. - comment letter	1
DOIPS0000631	DOIPS0000636	1st paragraph	Yates Petroleum Corp. - comment letter	1
DOIPS0000692	DOIPS0000693	2nd full paragraph	Big Horn County, Office of County Commissioners - comment letter	1

DOIPS0000697	DOIPS0000697	1st paragraph	Board of Commissioners, Rio Blanco County - comment letter	1
DOIPS0000697	DOIPS0000698	1st paragraph	Board of Commissioners, Rio Blanco County - comment letter	1
DOIPS0000705	DOIPS0000705	Last full paragraph	Hot Springs County Commissioners - comment letter	1
DOIPS0000926	DOIPS0000926	5th paragraph	Office of Board of Commissioners, Weld County Colorado - comment letter	1
DOIPS0000942	DOIPS0000943	1st paragraph	Board of Carbon County Commissioners - comment letter	1
DOIPS0001047	DOIPS0001047	2nd bulleted paragraph	Campbell County Board of Commissioners - comment letter	1
DOIPS0006791	DOIPS0006791-92	2nd bulleted paragraph	Samson Resources - comment letter	1
DOIPS0006797	DOIPS0006797	1st paragraph	Encana Oil & Gas - comment letter	1
DOIPS0008141	DOIPS0008141-42	Section "Rule inconsistencies and Duplication"	Sweetwater County Board of County Commissioners - comment letter	1
DOIPS0008285	DOIPS0008286-87	Section 2	Black Hills Exploration and Production and Midstream LLC - comment letter	1
DOIPS0008285	DOIPS0008288	Sections 4 & 5	Black Hills Exploration and Production and Midstream LLC - comment letter	1
DOIPS0008285	DOIPS0008302	Conclusion 2 & 4	Black Hills Exploration and Production and Midstream LLC - comment letter	1
DOIPS0008308	DOIPS0008308-09	Last paragraph	Stark County, North Dakota - comment letter	1
DOIPS0008581	DOIPS0008582	1st bulleted paragraph	NX Petroleum Corp. - comment letter	1
DOIPS0008585	DOIPS0008585	1st bulleted paragraph	UnionTown Energy Inc. - comment letter	1

DOIPS0008649	DOIPS0008649	Entire page	Milburn, Mike - Montana Speaker of the House - comment letter	1
DOIPS0008706	DOIPS0008708	Section "BLM's rule will exact heavy regulatory costs on the west", 1st paragraph	Western Business Roundtable - comment letter	1
DOIPS0008706	DOIPS0008712	1st "--" paragraph	Western Business Roundtable - comment letter	1
DOIPS0008717	DOIPS0008717-18	2nd & 3rd paragraphs	Office of the Governor, State of Wyoming - comment letter	1
DOIPS0008723	DOIPS0008723	3rd bulleted sentence	Devon Energy Corp. - comment letter	1
DOIPS0008723	DOIPS0008802	2nd paragraph	Devon Energy Corp. - comment letter	1
DOIPS0008723	DOIPS0008804	2nd paragraph	Devon Energy Corp. - comment letter	1
DOIPS0008723	DOIPS0008807	2nd full paragraph	Devon Energy Corp. - comment letter	1
DOIPS0008723	DOIPS0008808	3rd paragraph	Devon Energy Corp. - comment letter	1
DOIPS0008723	DOIPS0008810	3rd paragraph	Devon Energy Corp. - comment letter	1
DOIPS0008821	DOIPS0008822	2nd & 5th paragraph	Haliburton Energy Services, Inc. - comment letter	1
DOIPS0008821	DOIPS0008835-36	Section IV & IV A.	Haliburton Energy Services, Inc. - comment letter	1
DOIPS0008821	DOIPS0008843-44	Section V	Haliburton Energy Services, Inc. - comment letter	1
DOIPS0008821	DOIPS0008844-45	Section VI & VI A	Haliburton Energy Services, Inc. - comment letter	1
DOIPS0008959	DOIPS0008960	3rd paragraph	Utah Association of Counties - comment letter	1
DOIPS0008959	DOIPS0008963	2nd full paragraph	Utah Association of Counties - comment letter	1

DOIPS0008959	DOIPS0008966	1st full paragraph	Utah Association of Counties - comment letter	1
DOIPS0009115	DOIPS0009116	1st paragraph	Club 20 - comment letter	1
DOIPS0010354	DOIPS0010355	Section II	National Association of Manufacturers - comment letter	1
DOIPS0010354	DOIPS0010355-56	Section II A.	National Association of Manufacturers - comment letter	1
DOIPS0010354	DOIPS0010358-59	Section II D.	National Association of Manufacturers - comment letter	1
DOIPS0010476	DOIPS0010476	2nd paragraph	Peterson, Jim - President of the Montana State Senate - comment letter	1
DOIPS0010569	DOIPS0010569-70	Last paragraph	Petroleum Association of Wyoming - comment letter	1
DOIPS0010569	DOIPS0010570	2nd full paragraph	Petroleum Association of Wyoming - comment letter	1
DOIPS0010569	DOIPS0010571	1st full paragraph	Petroleum Association of Wyoming - comment letter	1
DOIPS0010581	DOIPS0010582	2nd paragraph	New Mexico Oil and Gas Association - comment letter	1
DOIPS0010588	DOIPS0010588	3rd paragraph	County of Dawson, Montana - comment letter	1
DOIPS0010651	DOIPS0010655-56	Section I B	Independent Petroleum Association of America & Western Energy Alliance - comment letter	1
DOIPS0010700	DOIPS0010703	1st full paragraph	American Petroleum Institute - comment letter	1
DOIPS0010708	DOIPS0010708	5th paragraph	Addendum to American Petroleum Institute - comment letter	1
DOIPS0010767	DOIPS0010767	1st & 3rd paragraph	Representative Thomas Lubnau, Wyoming House of Representatives - comment letter	1

DOIPS0010770	DOIPS0010770	3rd paragraph	Join Minerals, Business & Economic Development Committee - Wyoming - comment letter	1
DOIPS0010821	DOIPS0010824-25	Last paragraph	America's Natural Gas Alliance, The American Exploration & Production Council & US Oil & Gas Assc. - comment letter	1
DOIPS0010821	DOIPS0010850-52	Section V C. 2. a.	America's Natural Gas Alliance, The American Exploration & Production Council & US Oil & Gas Assc. - comment letter	1
DOIPS0010974	DOIPS0010975	Key Component # 4.	Permian Basin Petroleum Association - comment letter	1
DOIPS0010974	DOIPS0010976-77	Executive Summary	Permian Basin Petroleum Association - comment letter	1
DOIPS0010974	DOIPS0010978	2nd full paragraph	Permian Basin Petroleum Association - comment letter	1
DOIPS0010974	DOIPS0010980	2nd "Reasoning" section	Permian Basin Petroleum Association - comment letter	1
DOIPS0010974	DOIPS0010980-81	Section 3162.3-3(c)(2)	Permian Basin Petroleum Association - comment letter	1
DOIPS0010974	DOIPS0010983	Section 3162.3-3(c)(6)	Permian Basin Petroleum Association - comment letter	1
DOIPS0010974	DOIPS0010984	Section 3162.3-3(c)(6)(ii) & (iii)	Permian Basin Petroleum Association - comment letter	1
DOIPS0010974	DOIPS0010986-87	Section 3162.3-3(f)	Permian Basin Petroleum Association - comment letter	1
DOIPS0010974	DOIPS0010988	Section 3162.3-3(g)(4) & (5)	Permian Basin Petroleum Association - comment letter	1

DOIPS0010974	DOIPS0010989	Section 3162.3-3(g)(10)	Permian Basin Petroleum Association - comment letter	1
DOIPS0010974	DOIPS0010990	Section 3162.3-3(g)(10)(ii) & (iii)	Permian Basin Petroleum Association - comment letter	1
DOIPS0011014	DOIPS0011014	1st paragraph	Wyoming Congressional Delegation - comment letter	1
DOIPS0065370	DOIPS0065370	3rd paragraph	Ertman, Martha L. - Weston County Commissioner - comment letter	2
DOIPS0065378	DOIPS0065378	Last paragraph	McCone County - comment letter	2
DOIPS0065399	DOIPS0065399-400	Last paragraph	Stark County, North Dakota - comment letter	2
DOIPS0065441	DOIPS0065441	3rd paragraph	Washakie County Commissioners - comment letter	2
DOIPS0065445	DOIPS0065445	1st paragraph	Goshen County - comment letter	2
DOIPS0065512	DOIPS0065512-13	Last paragraph	Wyoming Oil and Gas Conservation Commission - comment letter	2
DOIPS0065541	DOIPS0065541	1st bulleted sentence	Grand Junction Area Chamber of Commerce - comment letter	2
DOIPS0065596	DOIPS0065597	1st full paragraph	Strata Production Company - comment letter	2
DOIPS0065646	DOIPS0065646	Paragraph labeled as "1."	Petro-Hunt LLC - comment letter	2
DOIPS0065646	DOIPS0065647	Paragraph labeled as "2."	Petro-Hunt LLC - comment letter	2
DOIPS0065646	DOIPS0065648	Paragraph labeled as "5."	Petro-Hunt LLC - comment letter	2
DOIPS0065651	DOIPS0065652	2nd paragraph	West Virginia Oil and Natural Gas Association - comment letter	2
DOIPS0065662	DOIPS0065662	2nd & last paragraph	Young, Steve - comment letter	2
DOIPS0065669	DOIPS0065669-70	Last paragraph	Heitkamp, Heidi - Candidate for the US	2

			Senate for North Dakota - comment letter	
DOIPS0065683	DOIPS0065683	1st paragraph	Stewart, Cody - Energy Advisor to the Governor of Utah - comment letter	2
DOIPS0065683	DOIPS0065686	1st full paragraph	Stewart, Cody - Energy Advisor to the Governor of Utah - comment letter	2
DOIPS0065683	DOIPS0065693	2nd paragraph	Stewart, Cody - Energy Advisor to the Governor of Utah - comment letter	2
DOIPS0065683	DOIPS0065695	2nd paragraph	Stewart, Cody - Energy Advisor to the Governor of Utah - comment letter	2
DOIPS0065712	DOIPS0065712	3rd paragraph	Perkins, Drew - Wyoming State Senator - comment letter	2
DOIPS0065723	DOIPS0065723	1st & 2nd paragraph	Miller Energy Company - comment letter	2
DOIPS0065734	DOIPS0065734	Last paragraph	Eddy County Board of Commissioners - comment letter	2
DOIPS0065759	DOIPS0065760	4th paragraph	Mesa County, Colorado, Board of County Commissioners - comment letter	2
DOIPS0065764	DOIPS0065765	8th paragraph	New Mexico Oil & Gas Association - comment letter	2
DOIPS0065892	DOIPS0065894	Sections 3162.3- 3(f), (g), & (h)	Industrial Commission of North Dakota - comment letter	2
DOIPS0065892	DOIPS0065895	2nd to last paragraph	Industrial Commission of North Dakota - comment letter	2
DOIPS0066528	DOIPS0066532-33	Section "consistency with state regulations and coordination with state agencies"	Gene R. George & Associates, on behalf of Yates Petroleum Corp. - comment letter	2
DOIPS0067047	DOIPS0067048	1st paragraph & paragraph "2)"	North Dakota Petroleum Council - comment letter	2

DOIPS0067086	DOIPS0067086	3rd paragraph	Railroad Commission of Texas - comment letter	2
DOIPS0067086	DOIPS0067089-90	Last paragraph	Railroad Commission of Texas - comment letter	2
DOIPS0067101	DOIPS0067102	Section "Rule Inconsistencies and Duplication"	Sweetwater County Board of County Commissioners - comment letter	2
DOIPS0067241	DOIPS0067242	3rd full paragraph & paragraph "2)"	Slawson Exploration Company - comment letter	2
DOIPS0067241	DOIPS0067243	Paragraph labeled as "4)"	Slawson Exploration Company - comment letter	2
DOIPS0179033	DOIPS0179033	3rd paragraph	Encana Oil & Gas - comment letter	3
DOIPS0179033	DOIPS0179034	1st full paragraph	Encana Oil & Gas - comment letter	3
DOIPS0179186	DOIPS0179187	3rd full paragraph	Petroleum Association of Wyoming - comment letter	3
DOIPS0301182	DOIPS0301184	Section 2 a., d., e., & f.	Black Hills Exploration and Production and Midstream LLC - comment letter	4
DOIPS0301182	DOIPS0301185	Section 4 & 5	Black Hills Exploration and Production and Midstream LLC - comment letter	4
DOIPS0301234	DOIPS0301234	2nd paragraph	Rio Blanco County Board of County Commissioners - comment letter	4
DOIPS0301237	DOIPS0301239	2nd full paragraph	Domestic Energy Producers Alliance - comment letter	4
DOIPS0301298	DOIPS0301298	2nd paragraph	National Association of Manufacturers - comment letter	4
DOIPS0301298	DOIPS0301301-02	Paragraph labeled as "2."	National Association of Manufacturers - comment letter	4
DOIPS0301298	DOIPS0301304	Paragraph labeled as "7."	National Association of Manufacturers - comment letter	4

DOIPS0301514	DOIPS0301517-18	Section 9	Industrial Energy Consumers of America - comment letter	4
DOIPS0301566	DOIPS0301568	Section I.	America's Natural Gas Alliance & The American Exploration & Production Council - comment letter	4
DOIPS0301566	DOIPS0301569	1st paragraph	America's Natural Gas Alliance & The American Exploration & Production Council - comment letter	4
DOIPS0301566	DOIPS0301570-71	Last two paragraphs	America's Natural Gas Alliance & The American Exploration & Production Council - comment letter	4
DOIPS0365270	DOIPS0365271	2nd full paragraph	Institute for Energy Research - comment letter	5
DOIPS0389307	DOIPS0389307	3rd paragraph	New Mexico Oil & Gas Association - comment letter	5
DOIPS0389508	DOIPS0389510	3rd & 4th paragraphs	Coalition of Local Governments - comment letter	5
DOIPS0392214	DOIPS0392214	1st paragraph	Office of the Governor, State of Utah - comment letter	5

In support of the argument that the variance process contained within the Bureau's hydraulic fracturing rule is inadequate and does not alleviate the States' concerns for its sovereign authority (Doc. 32-1, pp. 18–19), see the following documents in the record:

Document #	Page #	Pin cite	Document Description	Disc
DOIAR0054749	DOIAR0054750	Section 3162.3-3(k)	Industrial Commission of North Dakota - comment letter	3
DOIAR0074389	DOIAR0074392	Last paragraph	New Mexico Oil Conservation Division - comment letter	3

DOIPS0000631	DOIPS0000650	1st full paragraph	Yates Petroleum Corp. - comment letter	1
DOIPS0008285	DOIPS0008301	Section 26	Black Hills Exploration and Production and Midstream LLC - comment letter	1
DOIPS0008723	DOIPS0008760-61	Section VII H.	Devon Energy Corp. - comment letter	1
DOIPS0010708	DOIPS0010727	Section 3162.3-3	American Petroleum Institute - comment letter	1
DOIPS0010821	DOIPS0010894-95	Section XIII	America's Natural Gas Alliance, The American Exploration & Production Council & US Oil & Gas Assc. - comment letter	1
DOIPS0066528	DOIPS0066556-57	Section "3162.3-3(k) - requesting a variance from the requirements of this section"	Gene R. George & Associates, on behalf of Yates Petroleum Corp. - comment letter	2
DOIPS0178933	DOIPS0178949	2nd bulleted paragraph	Independent Petroleum Association of America & Western Energy Alliance - comment letter	3
DOIPS0178933	DOIPS0178986-87	Section VII	Independent Petroleum Association of America & Western Energy Alliance - comment letter	3
DOIPS0301201	DOIPS0301203	1st bulleted paragraph	Wyoming Oil and Gas Conservation Commission - comment letter	4
DOIPS0301246	DOIPS0301270-71	Section V e.	American Petroleum Institute - comment letter	4
DOIPS0301566	DOIPS0301569-71	Section I.A.2.	America's Natural Gas Alliance & The American Exploration & Production Council - comment letter	4
DOIPS0365277	DOIPS0365298-99	Section VII d.	Devon Energy Corporation - comment letter	5
DOIPS0389247	DOIPS0389248	Section I A.	QEP Energy Company - comment letter	5

DOIPS0389297	DOIPS0389302	Section "F."	Mountain States Legal Foundation - comment letter	5
DOIPS0435703	DOIPS0435705-06	Section beginning "BLM's variance proposal"	Wyoming County Commissioners Association - comment letter	5

In support of the argument that implementation of the Bureau's hydraulic fracturing rule will result in further delay in the approval of applications for permit to drill (APD) (Doc. 32-1, p. 20), see the following documents in the record:

Document #	Page #	Pin cite	Document Description	Disc
DOJAR0014055	DOJAR0014055	2nd paragraph	Office of the Governor, State of Wyoming - comment letter	1
DOJAR0028390	DOJAR0028392	2nd to last full paragraph	Wyoming County Commissioners Association - comment letter	2
DOJAR0028390	DOJAR0028393	2nd paragraph	Wyoming County Commissioners Association - comment letter	2
DOJAR0043104	DOJAR0043104	2nd paragraph	Office of the Governor, State of Wyoming - comment letter	2
DOJAR0055854	DOJAR0055854	1st & 2nd paragraph	Wyoming Congressional Delegation - comment letter	3
DOJAR0057065	DOJAR0057066	2nd paragraph	Select Committee on Federal Natural Resource Management - Wyoming - comment letter	3
DOJAR0074389	DOJAR0074390	1st full paragraph	New Mexico Oil Conservation Division - comment letter	3
DOIPS0000181	DOIPS0000183	Section "Disadvantage to public land states"	Western Energy Alliance - comment letter	1
DOIPS0000197	DOIPS0000197	3rd paragraph	America's Natural Gas Alliance - comment letter	1

DOIPS0000216	DOIPS0000216	2nd paragraph	American Exploration and Production Council - comment letter	1
DOIPS0000245	DOIPS0000245-46	Last paragraph	Industrial Energy Consumers of America - comment letter	1
DOIPS0000245	DOIPS0000246	Section 2	Industrial Energy Consumers of America - comment letter	1
DOIPS0000300	DOIPS0000302	Section "3162.3-3(c)(5)"	Industrial Commission of North Dakota - comment letter	1
DOIPS0000300	DOIPS0000304	Section "Additional Comments" - 3rd paragraph	Industrial Commission of North Dakota - comment letter	1
DOIPS0000300	DOIPS0000305	1st full paragraph	Industrial Commission of North Dakota - comment letter	1
DOIPS0000616	DOIPS0000617	4th full paragraph	Railroad Commission of Texas - comment letter	1
DOIPS0000631	DOIPS0000632	1st full paragraph	Yates Petroleum Corp. - comment letter	1
DOIPS0000631	DOIPS0000634	3rd full paragraph	Yates Petroleum Corp. - comment letter	1
DOIPS0000692	DOIPS0000692	4th paragraph	Big Horn County, Office of County Commissioners - comment letter	1
DOIPS0000697	DOIPS0000697	2nd paragraph	Board of Commissioners, Rio Blanco County - comment letter	1
DOIPS0000906	DOIPS0000907	1st paragraph	Washington County Commissioners - comment letter	1
DOIPS0000942	DOIPS0000942	Last paragraph	Board of Carbon County Commissioners - comment letter	1
DOIPS0000945	DOIPS0000945	1st & 2nd paragraphs	Catrino, Michael F. - comment letter	1
DOIPS0000955	DOIPS0000956	2nd full paragraph	Moffat County Commissioners - comment letter	1
DOIPS0001023	DOIPS0001023	1st & 2nd paragraphs	Medina, Sabrina - comment letter	1

DOIPS0006791	DOIPS0006792	3rd bulleted full paragraph	Samson Resources - comment letter	1
DOIPS0008074	DOIPS0008074	2nd bulleted sentence	WWC Engineering - comment letter	1
DOIPS0008141	DOIPS0008141	Section "Economic impact of proposed rules"	Sweetwater County Board of County Commissioners - comment letter	1
DOIPS0008141	DOIPS0008141-42	Section "Rule inconsistencies and Duplication"	Sweetwater County Board of County Commissioners - comment letter	1
DOIPS0008285	DOIPS0008288	Section 4	Black Hills Exploration and Production and Midstream LLC - comment letter	1
DOIPS0008285	DOIPS0008302	Conclusion #4	Black Hills Exploration and Production and Midstream LLC - comment letter	1
DOIPS0008308	DOIPS0008309	1st full paragraph	Stark County, North Dakota - comment letter	1
DOIPS0008581	DOIPS0008582	2nd bulleted sentence	NX Petroleum Corp. - comment letter	1
DOIPS0008585	DOIPS0008585	2nd bulleted paragraph	UnionTown Energy Inc. - comment letter	1
DOIPS0008706	DOIPS0008709	2nd paragraph	Western Business Roundtable - comment letter	1
DOIPS0008706	DOIPS0008712	2nd bulleted paragraph	Western Business Roundtable - comment letter	1
DOIPS0008717	DOIPS0008720-21	Section "BLM budget and staffing"	Office of the Governor, State of Wyoming - comment letter	1
DOIPS0008723	DOIPS0008724	2nd to last bulleted paragraph	Devon Energy Corp. - comment letter	1
DOIPS0008723	DOIPS0008731-33	Section IV A & A 2.	Devon Energy Corp. - comment letter	1
DOIPS0008723	DOIPS0008765	2nd bulleted paragraph	Devon Energy Corp. - comment letter	1
DOIPS0008723	DOIPS0008801	2nd & 3rd bulleted paragraph	Devon Energy Corp. - comment letter	1

DOIPS0008723	DOIPS0008802	2nd paragraph	Devon Energy Corp. - comment letter	1
DOIPS0008723	DOIPS0008805	1st paragraph	Devon Energy Corp. - comment letter	1
DOIPS0008821	DOIPS0008843-44	2nd bulleted paragraph & section V	Haliburton Energy Services, Inc. - comment letter	1
DOIPS0008821	DOIPS0008844-45	Section VI A	Haliburton Energy Services, Inc. - comment letter	1
DOIPS0008959	DOIPS0008961-62	5th paragraph	Utah Association of Counties - comment letter	1
DOIPS0008959	DOIPS0008964-65	Last paragraph	Utah Association of Counties - comment letter	1
DOIPS0008959	DOIPS0008966	1st full paragraph	Utah Association of Counties - comment letter	1
DOIPS0010195	DOIPS0010203	2nd paragraph	Schlumberger - comment letter	1
DOIPS0010261	DOIPS0010265-66	Last paragraph	Board of Lincoln County Commissioners - comment letter	1
DOIPS0010354	DOIPS0010355	Section II, 2nd paragraph	National Association of Manufacturers - comment letter	1
DOIPS0010354	DOIPS0010358-59	Section II D.	National Association of Manufacturers - comment letter	1
DOIPS0010389	DOIPS0010394	Last full paragraph	Coalition of Local Governments - comment letter	1
DOIPS0010569	DOIPS0010578	2nd paragraph	Petroleum Association of Wyoming - comment letter	1
DOIPS0010581	DOIPS0010581	Last paragraph	New Mexico Oil and Gas Association - comment letter	1
DOIPS0010700	DOIPS0010701-02	Last paragraph	American Petroleum Institute - comment letter	1
DOIPS0010700	DOIPS0010703-04	Section "Consideration of Certain Major development projects to	American Petroleum Institute - comment letter	1

		illustrate the potential consequence of regulatory delays"		
DOIPS0010700	DOIPS0010704-05	Section "Consideration of trends in increased regulatory delay and complexity for operations on BLM Managed lands"	American Petroleum Institute - comment letter	1
DOIPS0010708	DOIPS0010709	1st, 2nd, & 3rd paragraphs (including bullets)	American Petroleum Institute - comment letter	1
DOIPS0010770	DOIPS0010771	1st paragraph	Join Minerals, Business & Economic Development Committee - Wyoming - comment letter	1
DOIPS0010795	DOIPS0010796	1st bulleted sentence	Texas Oil and Gas Association - comment letter	1
DOIPS0010821	DOIPS0010823	1st paragraph	America's Natural Gas Alliance, The American Exploration & Production Council & US Oil & Gas Assc. - comment letter	1
DOIPS0010821	DOIPS0010824-25	Last paragraph	America's Natural Gas Alliance, The American Exploration & Production Council & US Oil & Gas Assc. - comment letter	1
DOIPS0010821	DOIPS0010829	1st full paragraph	America's Natural Gas Alliance, The American Exploration & Production Council & US Oil & Gas Assc. - comment letter	1
DOIPS0010821	DOIPS0010834-35	Section III C	America's Natural Gas Alliance, The American Exploration &	1

			Production Council & US Oil & Gas Assc. - comment letter	
DOIPS0011014	DOIPS0011014	1st & 2nd paragraph	Wyoming Congressional Delegation - comment letter	1
DOIPS0011028	DOIPS0011029	2nd & 3rd bulleted paragraphs	Republican Attorneys General Association & Republican Governors Association - comment letter	1
DOIPS0065366	DOIPS0065366-67	Last paragraph	Bruce, Tom - Weston County Commissioner - comment letter	2
DOIPS0065374	DOIPS0065375	2nd paragraph	Board of Laramie County Commissioners - comment letter	2
DOIPS0065378	DOIPS0065378	Last paragraph	McCone County - comment letter	2
DOIPS0065382	DOIPS0065382	4th bulleted sentence	Newfield Exploration Company - comment letter	2
DOIPS0065417	DOIPS0065418	2nd bulleted sentence	King, Jack E. - comment letter	2
DOIPS0065441	DOIPS0065441	3rd paragraph	Washakie County Commissioners - comment letter	2
DOIPS0065646	DOIPS0065646	Paragraph labeled as "1."	Petro-Hunt LLC - comment letter	2
DOIPS0065646	DOIPS0065647	Paragraph labeled as "3."	Petro-Hunt LLC - comment letter	2
DOIPS0065683	DOIPS0065694	1st paragraph	Stewart, Cody - Energy Advisor to the Governor of Utah - comment letter	2
DOIPS0065755	DOIPS0065756	2nd paragraph	Carbon County - comment letter	2
DOIPS0065759	DOIPS0065760	4th paragraph	Mesa County, Colorado, Board of County Commissioners - comment letter	2
DOIPS0065892	DOIPS0065896	1st full paragraph	Industrial Commission of North Dakota - comment letter	2
DOIPS0066528	DOIPS0066531	1st full paragraph	Gene R. George & Associates, on behalf of	2

			Yates Petroleum Corp. - comment letter	
DOIPS0067047	DOIPS0067048	2nd bullet under paragraph labeled as "2)"	North Dakota Petroleum Council - comment letter	2
DOIPS0067086	DOIPS0067089	5th full paragraph & last paragraph	Railroad Commission of Texas - comment letter	2
DOIPS0067101	DOIPS0067102	Section "Rule Inconsistencies and Duplication"	Sweetwater County Board of County Commissioners - comment letter	2
DOIPS0067241	DOIPS0067242	3rd full paragraph	Slawson Exploration Company, Inc. - comment letter	2
DOIPS0067241	DOIPS0067243	1st bulleted paragraph	Slawson Exploration Company, Inc. - comment letter	2
DOIPS0072015	DOIPS0072015	3rd paragraph	Montezuma County Board of County Commissioners - comment letter	2
DOIPS0138518	DOIPS0138518	3rd paragraph	Larsen, Lloyd - comment letter	2
DOIPS0178933	DOIPS0178943-45	All pages entirely	Independent Petroleum Association of America & Western Energy Alliance - comment letter	3
DOIPS0178933	DOIPS0178990	Section VIII	Independent Petroleum Association of America & Western Energy Alliance - comment letter	3
DOIPS0179033	DOIPS0179034	1st full paragraph	Encana Oil & Gas - comment letter	3
DOIPS0179186	DOIPS0179193-94	Last paragraph	Petroleum Association of Wyoming - comment letter	3
DOIPS0301182	DOIPS0301185	Section 4 a.	Black Hills Exploration and Production and Midstream LLC - comment letter	4
DOIPS0301234	DOIPS0301234-35	Last paragraph	Rio Blanco County Board of County Commissioners - comment letter	4

DOIPS0301237	DOIPS0301239	2nd full paragraph	Domestic Energy Producers Alliance - comment letter	4
DOIPS0301246	DOIPS0301254-58	Section I c. & d.	American Petroleum Institute - comment letter	4
DOIPS0301276	DOIPS0301278	1st paragraph	Office of the Governor, State of Wyoming - comment letter	4
DOIPS0301298	DOIPS0301301-02	Paragraph labeled as "2."	National Association of Manufacturers - comment letter	4
DOIPS0301298	DOIPS0301304	Paragraph labeled as "7."	National Association of Manufacturers - comment letter	4
DOIPS0301514	DOIPS0301517	Sections 5 & 7	Industrial Energy Consumers of America - comment letter	4
DOIPS0365270	DOIPS0365271	2nd full paragraph	Institute for Energy Research - comment letter	5
DOIPS0365277	DOIPS0365293-99	Section VII	Devon Energy Corporation - comment letter	5
DOIPS0389297	DOIPS0389304	1st full paragraph	Mountain States Legal Foundation - comment letter	5
DOIPS0389508	DOIPS0389509	2nd paragraph	Coalition of Local Governments - comment letter	5
DOIPS0389508	DOIPS0389515	1st full paragraph	Coalition of Local Governments - comment letter	5
DOIPS0435703	DOIPS0435703	2nd paragraph	Wyoming County Commissioners Association - comment letter	5
DOIPS0435725	DOIPS0435726	2nd to last full paragraph	ExxonMobil - comment letter	5
DOIPS0435725	DOIPS0435727	1st paragraph	ExxonMobil - comment letter	5

In support of the argument that implementation of the Bureau's hydraulic fracturing rule will discourage production of oil and gas on public lands (Doc. 32-1, p. 20), see the following documents in the record:

Document #	Page #	Pin cite	Document Description	Disc
DOJAR0028390	DOJAR0028393	2nd paragraph	Wyoming County Commissioners Association - comment letter	2
DOJAR0051035	DOJAR0051036	4th paragraph	Devon Energy Corporation - comment letter	2
DOJAR0055854	DOJAR0055854	1st & 2nd paragraph	Wyoming Congressional Delegation - comment letter	3
DOJAR0057065	DOJAR0057066	2nd paragraph	Select Committee on Federal Natural Resource Management - Wyoming - comment letter	3
DOIPS0000181	DOIPS0000181	4th bulleted sentence	Western Energy Alliance - comment letter	1
DOIPS0000197	DOIPS0000197	3rd paragraph	America's Natural Gas Alliance - comment letter	1
DOIPS0000216	DOIPS0000216	2nd paragraph	American Exploration and Production Council - comment letter	1
DOIPS0000245	DOIPS0000246	Section 4	Industrial Energy Consumers of America - comment letter	1
DOIPS0000300	DOIPS0000305	1st full paragraph	Industrial Commission of North Dakota - comment letter	1
DOIPS0000631	DOIPS0000634	2nd full paragraph	Yates Petroleum Corp. - comment letter	1
DOIPS0000906	DOIPS0000907	1st paragraph	Washington County Commissioners - comment letter	1
DOIPS0000945	DOIPS0000945	1st & 4th paragraphs	Catrino, Michael F. - comment letter	1
DOIPS0001023	DOIPS0001023	1st paragraph	Medina, Sabrina - comment letter	1
DOIPS0001023	DOIPS0001024	1st full paragraph	Medina, Sabrina - comment letter	1

DOIPS0008074	DOIPS0008074	3rd bulleted sentence	WWC Engineering - comment letter	1
DOIPS0008581	DOIPS0008582	3rd bulleted sentence	NX Petroleum Corp. - comment letter	1
DOIPS0008585	DOIPS0008585	3rd bulleted paragraph	UnionTown Energy Inc. - comment letter	1
DOIPS0008649	DOIPS0008649	Entire page	Milburn, Mike - Montana Speaker of the House - comment letter	1
DOIPS0008717	DOIPS0008717	2nd paragraph	Office of the Governor, State of Wyoming - comment letter	1
DOIPS0008723	DOIPS0008724	Last bulleted paragraph	Devon Energy Corp. - comment letter	1
DOIPS0008723	DOIPS0008742-44	Section VI & VI A.	Devon Energy Corp. - comment letter	1
DOIPS0008723	DOIPS0008751	Section VI E.	Devon Energy Corp. - comment letter	1
DOIPS0008723	DOIPS0008765	4th bulleted paragraph	Devon Energy Corp. - comment letter	1
DOIPS0008723	DOIPS0008800	Last paragraph	Devon Energy Corp. - comment letter	1
DOIPS0008723	DOIPS0008801	3rd bulleted paragraph	Devon Energy Corp. - comment letter	1
DOIPS0008869	DOIPS0008870	Last full paragraph	La Plata County Energy Council - comment letter	1
DOIPS0008959	DOIPS0008961	4th full paragraph	Utah Association of Counties - comment letter	1
DOIPS0008959	DOIPS0008964-65	Last paragraph	Utah Association of Counties - comment letter	1
DOIPS0008959	DOIPS0008965	Entire page	Utah Association of Counties - comment letter	1
DOIPS0008959	DOIPS0008966	1st full paragraph	Utah Association of Counties - comment letter	1
DOIPS0010354	DOIPS0010358-59	Section II D.	National Association of Manufacturers - comment letter	1
DOIPS0010476	DOIPS0010476	2nd paragraph	Peterson, Jim - President of the Montana State Senate - comment letter	1

DOIPS0010569	DOIPS0010570	2nd full paragraph	Petroleum Association of Wyoming - comment letter	1
DOIPS0010569	DOIPS0010578	2nd paragraph	Petroleum Association of Wyoming - comment letter	1
DOIPS0010581	DOIPS0010581	Last paragraph	New Mexico Oil and Gas Association - comment letter	1
DOIPS0010700	DOIPS0010701	1st full paragraph	American Petroleum Institute - comment letter	1
DOIPS0010700	DOIPS0010704-05	Section "Consideration of trends in increased regulatory delay and complexity for operations on BLM Managed lands"	American Petroleum Institute - comment letter	1
DOIPS0010770	DOIPS0010771	1st paragraph	Join Minerals, Business & Economic Development Committee - Wyoming - comment letter	1
DOIPS0010821	DOIPS0010823	1st paragraph	America's Natural Gas Alliance, The American Exploration & Production Council & US Oil & Gas Assc. - comment letter	1
DOIPS0010821	DOIPS0010829	Entire page	America's Natural Gas Alliance, The American Exploration & Production Council & US Oil & Gas Assc. - comment letter	1
DOIPS0010821	DOIPS0010830	Entire page	America's Natural Gas Alliance, The American Exploration & Production Council & US Oil & Gas Assc. - comment letter	1
DOIPS0010821	DOIPS0010831	1st paragraph	America's Natural Gas Alliance, The American Exploration &	1

			Production Council & US Oil & Gas Assc. - comment letter	
DOIPS0010821	DOIPS0010852-53	Section V C. 2. b.	America's Natural Gas Alliance, The American Exploration & Production Council & US Oil & Gas Assc. - comment letter	1
DOIPS0010974	DOIPS0010978	1st paragraph	Permian Basin Petroleum Association - comment letter	1
DOIPS0011014	DOIPS0011014	1st & 2nd paragraph	Wyoming Congressional Delegation - comment letter	1
DOIPS0011028	DOIPS0011028	Last paragraph	Republican Attorneys General Association & Republican Governors Association - comment letter	1
DOIPS0011028	DOIPS0011029	3rd bulleted paragraph	Republican Attorneys General Association & Republican Governors Association - comment letter	1
DOIPS0065417	DOIPS0065418	3rd bulleted sentence	King, Jack E. - comment letter	2
DOIPS0065646	DOIPS0065646	Paragraph labeled as "1."	Petro-Hunt LLC - comment letter	2
DOIPS0065646	DOIPS0065647	Paragraph labeled as "3."	Petro-Hunt LLC - comment letter	2
DOIPS0065646	DOIPS0065648	Paragraph labeled as "5."	Petro-Hunt LLC - comment letter	2
DOIPS0065662	DOIPS0065662	2nd paragraph	Young, Steve - comment letter	2
DOIPS0065683	DOIPS0065695	2nd paragraph	Stewart, Cody - Energy Advisor to the Governor of Utah - comment letter	2
DOIPS0065723	DOIPS0065723	1st & 2nd paragraph	Miller Energy Company - comment letter	2
DOIPS0065892	DOIPS0065896	5th full paragraph	Industrial Commission of North Dakota - comment letter	2
DOIPS0067047	DOIPS0067048	1st paragraph	North Dakota Petroleum Council - comment letter	2

DOIPS0067101	DOIPS0067101-02	Section "Economic Impacts of Proposed Rules"	Sweetwater County Board of County Commissioners - comment letter	2
DOIPS0072015	DOIPS0072015	3rd paragraph	Montezuma County Board of County Commissioners - comment letter	2
DOIPS0179186	DOIPS0179187	3rd full paragraph	Petroleum Association of Wyoming - comment letter	3
DOIPS0179186	DOIPS0179193-94	Last paragraph	Petroleum Association of Wyoming - comment letter	3
DOIPS0179197	DOIPS0179200	Section II B., 1st paragraph	Vorys on behalf of the Ohio Oil and Gas Association - comment letter	3
DOIPS0301234	DOIPS0301234-35	Last paragraph	Rio Blanco County Board of County Commissioners - comment letter	4
DOIPS0301246	DOIPS0301254-58	Section I c. & d.	American Petroleum Institute - comment letter	4
DOIPS0301514	DOIPS0301517	Section 6	Industrial Energy Consumers of America - comment letter	4
DOIPS0301566	DOIPS0301570-71	Last paragraph	America's Natural Gas Alliance & The American Exploration & Production Council - comment letter	4
DOIPS0365277	DOIPS0365285	Section IV	Devon Energy Corporation - comment letter	5
DOIPS0365277	DOIPS0365293-99	Section VII	Devon Energy Corporation - comment letter	5

In support of the argument that implementation of the Bureau's hydraulic fracturing rule will have a disproportionate effect on states like Wyoming and Colorado due to the

amount of federal land within those states (Doc. 32-1, p. 20), see the following documents in the record:

Document #	Page #	Pin cite	Document Description	Disc
DOIAR0051035	DOIAR0051045	Last bulleted paragraph	Devon Energy Corporation - comment letter	2
DOIAR0051035	DOIAR0051048	Entire page	Devon Energy Corporation - comment letter	2
DOIAR0051035	DOIAR0051049	Table	Devon Energy Corporation - comment letter	2
DOIAR0051035	DOIAR0051050	Last bulleted paragraph	Devon Energy Corporation - comment letter	2
DOIAR0055854	DOIAR0055854	2nd paragraph	Wyoming Congressional Delegation - comment letter	3
DOIAR0057065	DOIAR0057066	2nd paragraph	Select Committee on Federal Natural Resource Management - Wyoming - comment letter	3
DOIPS0000181	DOIPS0000183	Section "Disadvantage to public land states"	Western Energy Alliance - comment letter	1
DOIPS0008723	DOIPS0008765	1st bulleted paragraph	Devon Energy Corp. - comment letter	1
DOIPS0008959	DOIPS0008964-65	Last paragraph	Utah Association of Counties - comment letter	1
DOIPS0010354	DOIPS0010357-58	Section II C.	National Association of Manufacturers - comment letter	1
DOIPS0010651	DOIPS0010655-56	Last paragraph	Independent Petroleum Association of America & Western Energy Alliance - comment letter	1
DOIPS0010821	DOIPS0010897-915	Appendix A	America's Natural Gas Alliance, The American Exploration & Production Council &	1

			US Oil & Gas Assc. - comment letter	
DOIPS0011014	DOIPS0011014	2nd paragraph	Wyoming Congressional Delegation - comment letter	1
DOIPS0365277	DOIPS0365403	2nd bulleted paragraph	Devon Energy Corporation - comment letter	5
DOIPS0365277	DOIPS0365404	Table	Devon Energy Corporation - comment letter	5
DOIPS0365277	DOIPS0365406	Entire page	Devon Energy Corporation - comment letter	5

In support of the argument that implementation of the Bureau's hydraulic fracturing rule will result in economic harm to States, their subdivisions, and their citizens (Doc. 32-1, pp. 20–21), see the following documents in the record:

Document #	Page #	Pin cite	Document Description	Disc
DOIAR0028390	DOIAR0028393	Section "Delayed Permitting & Its Impact on Local Economies"	Wyoming County Commissioners Association - comment letter	2
DOIAR0051035	DOIAR0051036	4th paragraph	Devon Energy Corporation - comment letter	2
DOIAR0051035	DOIAR0051046	Entire page	Devon Energy Corporation - comment letter	2
DOIAR0051035	DOIAR0051049	Table	Devon Energy Corporation - comment letter	2
DOIAR0074389	DOIAR0074390	1st full paragraph	New Mexico Oil Conservation Division - comment letter	3
DOIPS0000197	DOIPS0000197	3rd paragraph	America's Natural Gas Alliance - comment letter	1
DOIPS0000245	DOIPS0000246	1st full paragraph	Industrial Energy Consumers of America - comment letter	1

DOIPS0000245	DOIPS0000246	Section 4	Industrial Energy Consumers of America - comment letter	1
DOIPS0000245	DOIPS0000248	1st full non-numbered paragraph	Industrial Energy Consumers of America - comment letter	1
DOIPS0000616	DOIPS0000620	First full paragraph	Railroad Commission of Texas - comment letter	1
DOIPS0000692	DOIPS0000692-93	Last paragraph	Big Horn County, Office of County Commissioners - comment letter	1
DOIPS0000705	DOIPS0000705	2nd paragraph	Hot Springs County Commissioners - comment letter	1
DOIPS0000910	DOIPS0000910	2nd paragraph	Lincoln County, Nevada, Board of County Commissioners - comment letter	1
DOIPS0000926	DOIPS0000926	5th paragraph	Office of Board of Commissioners, Weld County Colorado - comment letter	1
DOIPS0000942	DOIPS0000943	1st paragraph	Board of Carbon County Commissioners - comment letter	1
DOIPS0008141	DOIPS0008141	Section "Economic Impact of Proposed Rules"	Sweetwater County Board of County Commissioners - comment letter	1
DOIPS0008649	DOIPS0008649	Entire page	Milburn, Mike - Montana Speaker of the House - comment letter	1
DOIPS0008706	DOIPS0008712	2nd bulleted paragraph	Western Business Roundtable - comment letter	1
DOIPS0008717	DOIPS0008717	2nd paragraph	Office of the Governor, State of Wyoming - comment letter	1
DOIPS0008723	DOIPS0008800	2nd bulleted sentence, last 2 paragraphs	Devon Energy Corp. - comment letter	1
DOIPS0008869	DOIPS0008870-71	Last paragraph	La Plata County Energy Council - comment letter	1

DOIPS0008959	DOIPS0008960	1st full paragraph	Utah Association of Counties - comment letter	1
DOIPS0008959	DOIPS0008961	4th full paragraph	Utah Association of Counties - comment letter	1
DOIPS0008959	DOIPS0008966	1st full paragraph	Utah Association of Counties - comment letter	1
DOIPS0008959	DOIPS0008967	1st & 2nd full paragraphs	Utah Association of Counties - comment letter	1
DOIPS0009100	DOIPS0009100	2nd paragraph	Grosskopf, Loren - Park County Commissioner - comment letter	1
DOIPS0009115	DOIPS0009115	Last full paragraph	Club 20 - comment letter	1
DOIPS0010261	DOIPS0010267	1st, 2nd, & 3rd paragraph	Board of Lincoln County Commissioners - comment letter	1
DOIPS0010354	DOIPS0010357-58	Section II C.	National Association of Manufacturers - comment letter	1
DOIPS0010389	DOIPS0010397-98	2nd, 3rd, & last paragraph	Coalition of Local Governments - comment letter	1
DOIPS0010476	DOIPS0010476	2nd paragraph	Peterson, Jim - President of the Montana State Senate - comment letter	1
DOIPS0010569	DOIPS0010570-71	2nd & 4th full paragraph, last paragraph	Petroleum Association of Wyoming - comment letter	1
DOIPS0010569	DOIPS0010578	2nd paragraph	Petroleum Association of Wyoming - comment letter	1
DOIPS0010700	DOIPS0010703-04	Section "Consideration of Certain Major development projects to illustrate the potential consequence of regulatory delays"	American Petroleum Institute - comment letter	1

DOIPS0010770	DOIPS0010770	2nd paragraph	Join Minerals, Business & Economic Development Committee - Wyoming - comment letter	1
DOIPS0010821	DOIPS0010829	1st full paragraph	America's Natural Gas Alliance, The American Exploration & Production Council & US Oil & Gas Assc. - comment letter	1
DOIPS0010821	DOIPS0010830	Last paragraph	America's Natural Gas Alliance, The American Exploration & Production Council & US Oil & Gas Assc. - comment letter	1
DOIPS0010821	DOIPS0010831	1st paragraph	America's Natural Gas Alliance, The American Exploration & Production Council & US Oil & Gas Assc. - comment letter	1
DOIPS0010821	DOIPS0010897-915	Appendix A	America's Natural Gas Alliance, The American Exploration & Production Council & US Oil & Gas Assc. - comment letter	1
DOIPS0010974	DOIPS0010980	2nd "Reasoning" section	Permian Basin Petroleum Association - comment letter	1
DOIPS0011028	DOIPS0011028	2nd bulleted sentence, last 2 paragraphs	Republican Attorneys General Association & Republican Governors Association - comment letter	1
DOIPS0065344	DOIPS0065344	1st paragraph	Phillips County Commissioners - comment letter	2
DOIPS0065362	DOIPS0065363	1st paragraph	Seeley, Lenard - Weston County Commissioner - comment letter	2
DOIPS0065370	DOIPS0065371	Last paragraph	Ertman, Martha L. - Weston County	2

			Commissioner - comment letter	
DOIPS0065374	DOIPS0065375	1st paragraph	Board of Laramie County Commissioners - comment letter	2
DOIPS0065378	DOIPS0065378	Last paragraph	McCone County - comment letter	2
DOIPS0065382	DOIPS0065382	2nd bulleted sentence	Newfield Exploration Company - comment letter	2
DOIPS0065441	DOIPS0065441	4th paragraph	Washakie County Commissioners - comment letter	2
DOIPS0065683	DOIPS0065690-92	Section "Economic Considerations"	Stewart, Cody - Energy Advisor to the Governor of Utah - comment letter	2
DOIPS0065683	DOIPS0065695	2nd paragraph	Stewart, Cody - Energy Advisor to the Governor of Utah - comment letter	2
DOIPS0065712	DOIPS0065712	Last paragraph	Perkins, Drew - Wyoming State Senator - comment letter	2
DOIPS0065755	DOIPS0065756	2nd paragraph	Carbon County - comment letter	2
DOIPS0067086	DOIPS0067089-90	Last paragraph	Railroad Commission of Texas - comment letter	2
DOIPS0067101	DOIPS0067101-02	Section "Economic Impacts of Proposed Rule"	Sweetwater County Board of County Commissioners - comment letter	2
DOIPS0179033	DOIPS0179034	1st full paragraph	Encana Oil & Gas - comment letter	3
DOIPS0179186	DOIPS0179187-88	3rd & 4th full paragraph & last paragraph	Petroleum Association of Wyoming - comment letter	3
DOIPS0179186	DOIPS0179193-94	Last paragraph	Petroleum Association of Wyoming - comment letter	3
DOIPS0301237	DOIPS0301239	2nd full paragraph	Domestic Energy Producers Alliance - comment letter	4
DOIPS0301514	DOIPS0301517	Section 6	Industrial Energy Consumers of America - comment letter	4

DOIPS0365270	DOIPS0365271	2nd full paragraph	Institute for Energy Research - comment letter	5
DOIPS0365277	DOIPS0365401	2nd bulleted paragraph & table	Devon Energy Corporation - comment letter	5
DOIPS0365277	DOIPS0365402	Entire page	Devon Energy Corporation - comment letter	5
DOIPS0365277	DOIPS0365403	1st bulleted paragraph & graph	Devon Energy Corporation - comment letter	5
DOIPS0365277	DOIPS0365406	Entire page	Devon Energy Corporation - comment letter	5
DOIPS0389508	DOIPS0389517	2nd, 3rd, & 4th full paragraphs	Coalition of Local Governments - comment letter	5
DOIPS0435703	DOIPS0435703	2nd paragraph	Wyoming County Commissioners Association - comment letter	5

Section II(C) - The balance of equities favor the States.

In support of the argument that the status quo is state regulation of hydraulic fracturing (Doc. 32-1, p. 22), see the following documents in the record:

Document #	Page #	Pin cite	Document Description	Disc
DOIAR0014055	DOIAR0014055	1st paragraph	Office of the Governor, State of Wyoming - comment letter	1
DOIAR0028390	DOIAR0028391	2nd paragraph	Wyoming County Commissioners Association - comment letter	2
DOIAR0043104	DOIAR0043104	1st paragraph	Office of the Governor, State of Wyoming - comment letter	2
DOIAR0051035	DOIAR0051038	2nd solid black bullet	Devon Energy Corporation - comment letter	2

DOIAR0055854	DOIAR0055854	1st, 3rd, & last paragraph	Wyoming Congressional Delegation - comment letter	3
DOIAR0074389	DOIAR0074389-90	Last paragraph	New Mexico Oil Conservation Division - comment letter	3
DOIPS0000181	DOIPS0000181-82	Last paragraph	Western Energy Alliance - comment letter	1
DOIPS0000181	DOIPS0000182	1st full paragraph	Western Energy Alliance - comment letter	1
DOIPS0000216	DOIPS0000216	3rd paragraph	American Exploration and Production Council - comment letter	1
DOIPS0000245	DOIPS0000245	1st paragraph	Industrial Energy Consumers of America - comment letter	1
DOIPS0000300	DOIPS0000304	Section "Additional Comments" - 1st paragraph	Industrial Commission of North Dakota	1
DOIPS0000631	DOIPS0000631	2nd paragraph	Yates Petroleum Corp. - comment letter	1
DOIPS0000631	DOIPS0000635-36	Section "Consistency with State Regulations and Coordination with State Agencies"	Yates Petroleum Corp. - comment letter	1
DOIPS0000692	DOIPS0000692	1st paragraph	Big Horn County, Office of County Commissioners - comment letter	1
DOIPS0000692	DOIPS0000693	1st & 2nd full paragraphs	Big Horn County, Office of County Commissioners - comment letter	1
DOIPS0000910	DOIPS0000910	2nd paragraph	Lincoln County, Nevada, Board of County Commissioners - comment letter	1
DOIPS0000926	DOIPS0000926	5th paragraph	Office of Board of Commissioners, Weld County Colorado - comment letter	1

DOIPS0000942	DOIPS0000942	3rd paragraph	Board of Carbon County Commissioners - comment letter	1
DOIPS0000945	DOIPS0000945	2nd & 4th paragraphs	Catrino, Michael F. - comment letter	1
DOIPS0000955	DOIPS0000955	2nd paragraph	Moffat County Commissioners - comment letter	1
DOIPS0001023	DOIPS0001023	2nd paragraph	Medina, Sabrina - comment letter	1
DOIPS0001023	DOIPS0001024	1st full paragraph	Medina, Sabrina - comment letter	1
DOIPS0001047	DOIPS0001047	1st & 2nd bulleted paragraphs	Campbell County Board of Commissioners - comment letter	1
DOIPS0006791	DOIPS0006791-92	2nd bulleted paragraph	Samson Resources - comment letter	1
DOIPS0008077	DOIPS0008077	Entire page	Action 22 - comment letter	1
DOIPS0008141	DOIPS0008141	Section "Wyoming State Rules"	Sweetwater County Board of County Commissioners - comment letter	1
DOIPS0008201	DOIPS0008201	1st paragraph	Clute Oil Corp. - comment letter	1
DOIPS0008285	DOIPS0008302	1st paragraph	Black Hills Exploration and Production and Midstream LLC - comment letter	1
DOIPS0008308	DOIPS0008308	2nd paragraph	Stark County, North Dakota - comment letter	1
DOIPS0008723	DOIPS0008723	1st paragraph	Devon Energy Corp. - comment letter	1
DOIPS0008723	DOIPS0008765	1st bulleted paragraph	Devon Energy Corp. - comment letter	1
DOIPS0008723	DOIPS0008802	1st paragraph	Devon Energy Corp. - comment letter	1
DOIPS0008723	DOIPS0008803	1st full paragraph	Devon Energy Corp. - comment letter	1
DOIPS0008723	DOIPS0008804	2nd paragraph	Devon Energy Corp. - comment letter	1
DOIPS0008723	DOIPS0008808	2nd paragraph	Devon Energy Corp. - comment letter	1
DOIPS0008869	DOIPS0008869-70	3rd & 4th paragraph	La Plata County Energy Council - comment letter	1

DOIPS0008869	DOIPS0008872-73	Last paragraph	La Plata County Energy Council - comment letter	1
DOIPS0008959	DOIPS0008963	2nd full paragraph	Utah Association of Counties - comment letter	1
DOIPS0008959	DOIPS0008964-65	Last paragraph	Utah Association of Counties - comment letter	1
DOIPS0010354	DOIPS0010355	Section II, 1st paragraph	National Association of Manufacturers	1
DOIPS0010354	DOIPS0010355-56	Section II A.	National Association of Manufacturers	1
DOIPS0010389	DOIPS0010391-92	Section 2	Coalition of Local Governments - comment letter	1
DOIPS0010569	DOIPS0010578	2nd paragraph	Petroleum Association of Wyoming - comment letter	1
DOIPS0010588	DOIPS0010588	1st & 3rd paragraphs	County of Dawson, Montana - comment letter	1
DOIPS0010651	DOIPS0010655-56	Section I B	Independent Petroleum Association of America & Western Energy Alliance - comment letter	1
DOIPS0010700	DOIPS0010703	1st full paragraph	American Petroleum Institute - comment letter	1
DOIPS0010821	DOIPS0010822	2nd full paragraph	America's Natural Gas Alliance, The American Exploration & Production Council & US Oil & Gas Assc. - comment letter	1
DOIPS0010821	DOIPS0010823	1st paragraph	America's Natural Gas Alliance, The American Exploration & Production Council & US Oil & Gas Assc. - comment letter	1
DOIPS0010821	DOIPS0010823-24	Last paragraph	America's Natural Gas Alliance, The American Exploration & Production Council & US Oil & Gas Assc. - comment letter	1

DOIPS0010974	DOIPS0010976-77	Executive Summary	Permian Basin Petroleum Association - comment letter	1
DOIPS0010974	DOIPS0010978	2nd full paragraph	Permian Basin Petroleum Association - comment letter	1
DOIPS0010974	DOIPS0010980-81	Section 3162.3-3(c)(2)	Permian Basin Petroleum Association - comment letter	1
DOIPS0010974	DOIPS0010983	Section 3162.3-3(c)(6)	Permian Basin Petroleum Association - comment letter	1
DOIPS0010974	DOIPS0010984	Section 3162.3-3(c)(6)(ii) & (iii)	Permian Basin Petroleum Association - comment letter	1
DOIPS0010974	DOIPS0010986-87	Section 3162.3-3(f)	Permian Basin Petroleum Association - comment letter	1
DOIPS0010974	DOIPS0010988	Section 3162.3-3(g)(4) & (5)	Permian Basin Petroleum Association - comment letter	1
DOIPS0011014	DOIPS0011014-15	1st, 3rd, & last paragraph	Wyoming Congressional Delegation - comment letter	1
DOIPS0065362	DOIPS0065362	3rd paragraph	Seeley, Lenard - Weston County Commissioner - comment letter	2
DOIPS0065366	DOIPS0065366	5th paragraph	Bruce, Tom - Weston County Commissioner - comment letter	2
DOIPS0065370	DOIPS0065370	3rd paragraph	Ertman, Martha L. - Weston County Commissioner - comment letter	2
DOIPS0065374	DOIPS0065374	2nd paragraph	Board of Laramie County Commissioners - comment letter	2
DOIPS0065378	DOIPS0065378	3rd paragraph	McCone County - comment letter	2
DOIPS0065417	DOIPS0065417	2nd to last paragraph	King, Jack E. - comment letter	2
DOIPS0065512	DOIPS0065515-23	Matrix of statue comparison	Wyoming Oil and Gas Conservation Commission - comment letter	2

DOIPS0065541	DOIPS0065541	Last paragraph	Grand Junction Area Chamber of Commerce - comment letter	2
DOIPS0065646	DOIPS0065648	Paragraph labeled as "5."	Petro-Hunt LLC - comment letter	2
DOIPS0065669	DOIPS0065669-70	Last paragraph	Heitkamp, Heidi - Candidate for the US Senate for North Dakota - comment letter	2
DOIPS0065669	DOIPS0065670	1st & last full paragraphs	Heitkamp, Heidi - Candidate for the US Senate for North Dakota - comment letter	2
DOIPS0065683	DOIPS0065684	2nd & 3rd full paragraphs	Stewart, Cody - Energy Advisor to the Governor of Utah - comment letter	2
DOIPS0065683	DOIPS0065693	2nd paragraph	Stewart, Cody - Energy Advisor to the Governor of Utah - comment letter	2
DOIPS0065712	DOIPS0065712	2nd paragraph	Perkins, Drew - Wyoming State Senator - comment letter	2
DOIPS0065723	DOIPS0065723	2nd paragraph	Miller Energy Company - comment letter	2
DOIPS0065723	DOIPS0065724	1st paragraph	Miller Energy Company - comment letter	2
DOIPS0065734	DOIPS0065734	3rd paragraph	Eddy County Board of Commissioners - comment letter	2
DOIPS0067086	DOIPS0067086	3rd paragraph	Railroad Commission of Texas - comment letter	2
DOIPS0067101	DOIPS0067101	Section "Wyoming State Rules"	Sweetwater County Board of County Commissioners - comment letter	2
DOIPS0067241	DOIPS0067241	4th paragraph	Slawson Exploration Company - comment letter	2
DOIPS0072015	DOIPS0072015	2nd paragraph	Montezuma County Board of County Commissioners - comment letter	2
DOIPS0178933	DOIPS0178935-37	Section "States are Regulating Hydraulic	Independent Petroleum Association of America & Western Energy Alliance - comment letter	3

		Fracturing Effectively"		
DOIPS0179197	DOIPS0179198-99	Last paragraph	Vorys on behalf of the Ohio Oil and Gas Association - comment letter	3
DOIPS0301182	DOIPS0301184	Section 2 a.	Black Hills Exploration and Production and Midstream LLC - comment letter	4
DOIPS0301234	DOIPS0301234	2nd paragraph	Rio Blanco County Board of County Commissioners - comment letter	4
DOIPS0301246	DOIPS0301252	1st full paragraph	American Petroleum Institute - comment letter	4
DOIPS0301514	DOIPS0301516	Section 3	Industrial Energy Consumers of America - comment letter	4
DOIPS0301514	DOIPS0301517	Section 4	Industrial Energy Consumers of America - comment letter	4
DOIPS0365270	DOIPS0365270	3rd paragraph	Institute for Energy Research - comment letter	5
DOIPS0435877	DOIPS0435877	3rd paragraph	Hoeven, John; Heitkamp, Heidi; Cramer, Kevin - comment letter	5

In support of the argument that the risk to the environment is minimal should the Court enjoin the Bureau's hydraulic fracturing rule (Doc. 32-1, p. 23), see the following documents in the record:

Document #	Page #	Pin cite	Document Description	Disc
DOIAR0102668	DOIAR0102728	Last paragraph of 2nd column, extending to the 3rd column	80 Fed. Reg. 16128 - Final Agency Rule on Hydraulic Fracturing	4
DOIPS0010700	DOIPS0010700	3rd paragraph	American Petroleum Institute - comment letter	1
DOIPS0066528	DOIPS0066530-31	Last paragraph and table	Gene R. George & Associates, on behalf of	2

			Yates Petroleum Corp. - comment letter	
DOIPS0178933	DOIPS0178935-37	Section "States Are Regulating Hydraulic Fracturing Effectively"	Independent Petroleum Association of America & Western Energy Alliance - comment letter	3
DOIPS0179197	DOIPS0179198-99	Last paragraph	Vorys on behalf of the Ohio Oil and Gas Association - comment letter	3
DOIPS0301234	DOIPS0301234	2nd paragraph	Rio Blanco County Board of County Commissioners - comment letter	4
DOIPS0301566	DOIPS0301568	Last paragraph	America's Natural Gas Alliance & The American Exploration & Production Council - comment letter	4
DOIPS0365245	DOIPS0365255-56	Section II B.	Haliburton Energy Services Inc. - comment letter	5
DOIPS0365277	DOIPS0365283-84	Section II c.	Devon Energy Corporation - comment letter	5

Section II(D) - Granting a preliminary injunction is in the public interest.

In support of the argument that the Bureau has insufficient resources to satisfy its obligations under the rule and that enjoining the rule will prevent waste of public resources (Doc. 32-1, p. 24), see the following documents in the record:

Document #	Page #	Pin cite	Document Description	Disc
DOIAR0028390	DOIAR0028392	Section "BLM Budget and Staffing Concerns"	Wyoming County Commissioners Association - comment letter	2
DOIAR0051035	DOIAR0051036	Last paragraph	Devon Energy Corporation - comment letter	2

DOIAR0051035	DOIAR0051037	1st & 2nd paragraphs	Devon Energy Corporation - comment letter	2
DOIAR0057065	DOIAR0057066	2nd paragraph	Select Committee on Federal Natural Resource Management - Wyoming - comment letter	3
DOIPS0000181	DOIPS0000182	1st full paragraph	Western Energy Alliance - comment letter	1
DOIPS0000216	DOIPS0000216	2nd paragraph	American Exploration and Production Council - comment letter	1
DOIPS0000245	DOIPS0000246	Section 2	Industrial Energy Consumers of America - comment letter	1
DOIPS0000300	DOIPS0000304	Section "Additional Comments" - 3rd paragraph	Industrial Commission of North Dakota - comment letter	1
DOIPS0000631	DOIPS0000632	1st full paragraph	Yates Petroleum Corp. - comment letter	1
DOIPS0000631	DOIPS0000634	3rd & 4th full paragraphs	Yates Petroleum Corp. - comment letter	1
DOIPS0000692	DOIPS0000692	4th paragraph	Big Horn County, Office of County Commissioners - comment letter	1
DOIPS0000697	DOIPS0000697	2nd paragraph	Board of Commissioners, Rio Blanco County - comment letter	1
DOIPS0001047	DOIPS0001047	2nd bulleted paragraph	Campbell County Board of Commissioners - comment letter	1
DOIPS0006791	DOIPS0006792	1st bulleted full paragraph	Samson Resources - comment letter	1
DOIPS0008285	DOIPS0008288	Section 4	Black Hills Exploration and Production and Midstream LLC - comment letter	1
DOIPS0008706	DOIPS0008709	2nd paragraph	Western Business Roundtable - comment letter	1
DOIPS0008717	DOIPS0008720-21	Section "BLM Budget and Staffing"	Office of the Governor, State of Wyoming - comment letter	1

DOIPS0008723	DOIPS0008729	Section III B	Devon Energy Corp. - comment letter	1
DOIPS0008723	DOIPS0008731-33	Section IV A & A 2.	Devon Energy Corp. - comment letter	1
DOIPS0008869	DOIPS0008871	1st full paragraph	La Plata County Energy Council - comment letter	1
DOIPS0010354	DOIPS0010356	3rd full paragraph	National Association of Manufacturers - comment letter	1
DOIPS0010569	DOIPS0010569-70	Last paragraph	Petroleum Association of Wyoming - comment letter	1
DOIPS0010569	DOIPS0010578	2nd paragraph	Petroleum Association of Wyoming - comment letter	1
DOIPS0010651	DOIPS0010655	3rd paragraph	Independent Petroleum Association of America & Western Energy Alliance - comment letter	1
DOIPS0010651	DOIPS0010661	Section I J	Independent Petroleum Association of America & Western Energy Alliance - comment letter	1
DOIPS0010708	DOIPS0010709	3rd paragraph	American Petroleum Institute - comment letter	1
DOIPS0010821	DOIPS0010824-25	Last paragraph	America's Natural Gas Alliance, The American Exploration & Production Council & US Oil & Gas Assc. - comment letter	1
DOIPS0010974	DOIPS0010974	Key Component # 2.	Permian Basin Petroleum Association - comment letter	1
DOIPS0065441	DOIPS0065441	3rd paragraph	Washakie County Commissioners - comment letter	2
DOIPS0065596	DOIPS0065597	1st full paragraph	Strata Production Company - comment letter	2
DOIPS0065662	DOIPS0065662	5th paragraph	Young, Steve - comment letter	2
DOIPS0065683	DOIPS0065686	Last paragraph	Stewart, Cody - Energy Advisor to the Governor of Utah - comment letter	2

DOIPS0066528	DOIPS0066531	1st full paragraph	Gene R. George & Associates, on behalf of Yates Petroleum Corp. - comment letter	2
DOIPS0179186	DOIPS0179187	1st full paragraph	Petroleum Association of Wyoming - comment letter	3
DOIPS0179186	DOIPS0179193-94	Last paragraph	Petroleum Association of Wyoming - comment letter	3
DOIPS0179197	DOIPS0179200-01	Section II B., 2nd paragraph	Vorys on behalf of the Ohio Oil and Gas Association - comment letter	3
DOIPS0301182	DOIPS0301185	Section 4 b.	Black Hills Exploration and Production and Midstream LLC - comment letter	4
DOIPS0301276	DOIPS0301278	1st paragraph	Office of the Governor, State of Wyoming - comment letter	4
DOIPS0301298	DOIPS0301301-02	Paragraph labeled as "2."	National Association of Manufacturers - comment letter	4
DOIPS0301298	DOIPS0301304	Paragraph labeled as "6."	National Association of Manufacturers - comment letter	4
DOIPS0301514	DOIPS0301517	Section 5	Industrial Energy Consumers of America - comment letter	4
DOIPS0365277	DOIPS0365306-07	Section IX	Devon Energy Corporation - comment letter	5
DOIPS0435725	DOIPS0435727	1st paragraph	ExxonMobil - comment letter	5

In support of the argument that States are more flexible in their approach to hydraulic fracturing, are more able to address local conditions, and are able to review permitting information more quickly than the Bureau (Doc. 32-1, p. 25), see the following documents in the record:

Document #	Page #	Pin cite	Document Description	Disc
DOIAR0028390	DOIAR0028391	Last paragraph	Wyoming County Commissioners Association - comment letter	2
DOIAR0028390	DOIAR0028392	1st paragraph	Wyoming County Commissioners Association - comment letter	2
DOIAR0028390	DOIAR0028393	3rd paragraph	Wyoming County Commissioners Association - comment letter	2
DOIAR0051035	DOIAR0051038	1st solid black bullet	Devon Energy Corporation - comment letter	2
DOIAR0054749	DOIAR0054750	Section "additional comments"	Industrial Commission of North Dakota - comment letter	3
DOIAR0074389	DOIAR0074389-90	Last paragraph	New Mexico Oil Conservation Division - comment letter	3
DOIPS0000181	DOIPS0000182	1st full paragraph	Western Energy Alliance - comment letter	1
DOIPS0000300	DOIPS0000304	Section "Additional Comments" - 2nd paragraph	Industrial Commission of North Dakota - comment letter	1
DOIPS0000616	DOIPS0000617-18	Last paragraph	Railroad Commission of Texas - comment letter	1
DOIPS0000631	DOIPS0000632	2nd full paragraph	Yates Petroleum Corp. - comment letter	1
DOIPS0000631	DOIPS0000633-34	Last paragraph	Yates Petroleum Corp. - comment letter	1
DOIPS0000631	DOIPS0000634	1st full paragraph	Yates Petroleum Corp. - comment letter	1
DOIPS0000692	DOIPS0000692	2nd paragraph	Big Horn County, Office of County Commissioners - comment letter	1
DOIPS0000697	DOIPS0000697	2nd paragraph	Board of Commissioners, Rio Blanco County - comment letter	1
DOIPS0000910	DOIPS0000911	Last paragraph	Lincoln County, Nevada, Board of County	1

			Commissioners - comment letter	
DOIPS0000934	DOIPS0000934	5th paragraph	County of Lea, New Mexico - resolution opposing proposed rules for hydraulic fracturing	1
DOIPS0000942	DOIPS0000942	2nd paragraph	Board of Carbon County Commissioners - comment letter	1
DOIPS0008141	DOIPS0008141	Section "Wyoming State Rules"	Sweetwater County Board of County Commissioners - comment letter	1
DOIPS0008285	DOIPS0008286-87	Section 2	Black Hills Exploration and Production and Midstream LLC - comment letter	1
DOIPS0008285	DOIPS0008288	Section 4	Black Hills Exploration and Production and Midstream LLC - comment letter	1
DOIPS0008285	DOIPS0008302	Conclusion #2	Black Hills Exploration and Production and Midstream LLC - comment letter	1
DOIPS0008649	DOIPS0008649	Last paragraph	Milburn, Mike - Montana Speaker of the House - comment letter	1
DOIPS0008706	DOIPS0008711	Last paragraph	Western Business Roundtable - comment letter	1
DOIPS0008717	DOIPS0008718	2nd full paragraph	Office of the Governor, State of Wyoming - comment letter	1
DOIPS0008723	DOIPS0008723-24	Section "The BLM rule ignores state primacy as it:"	Devon Energy Corp. - comment letter	1
DOIPS0008723	DOIPS0008729	Section III B	Devon Energy Corp. - comment letter	1
DOIPS0008723	DOIPS0008731	Section IV A 1.	Devon Energy Corp. - comment letter	1
DOIPS0008723	DOIPS0008765	3rd bulleted paragraph	Devon Energy Corp. - comment letter	1
DOIPS0008723	DOIPS0008800	3rd bulleted sentence	Devon Energy Corp. - comment letter	1

DOIPS0008723	DOIPS0008801	5th bulleted paragraph	Devon Energy Corp. - comment letter	1
DOIPS0008723	DOIPS0008810	2nd paragraph	Devon Energy Corp. - comment letter	1
DOIPS0008959	DOIPS0008960	4th full paragraph	Utah Association of Counties - comment letter	1
DOIPS0008959	DOIPS0008963-64	Last paragraph	Utah Association of Counties - comment letter	1
DOIPS0009100	DOIPS0009100	3rd paragraph	Grosskopf, Loren - Park County Commissioner - comment letter	1
DOIPS0010354	DOIPS0010356	3rd full paragraph	National Association of Manufacturers - comment letter	1
DOIPS0010476	DOIPS0010476	4th paragraph	Peterson, Jim - President of the Montana State Senate - comment letter	1
DOIPS0010588	DOIPS0010588	1st paragraph	County of Dawson, Montana - comment letter	1
DOIPS0010651	DOIPS0010655-56	Last 2 paragraphs	Independent Petroleum Association of America & Western Energy Alliance - comment letter	1
DOIPS0010821	DOIPS0010823-24	Last paragraph	America's Natural Gas Alliance, The American Exploration & Production Council & US Oil & Gas Assc. - comment letter	1
DOIPS0010821	DOIPS0010824-25	Last paragraph	America's Natural Gas Alliance, The American Exploration & Production Council & US Oil & Gas Assc. - comment letter	1
DOIPS0011028	DOIPS0011028	3rd bulleted paragraph	Republican Attorneys General Association & Republican Governors Association - comment letter	1
DOIPS0011028	DOIPS0011029	5th bulleted paragraph	Republican Attorneys General Association & Republican Governors	1

			Association - comment letter	
DOIPS0065366	DOIPS0065366	5th paragraph	Bruce, Tom - Weston County Commissioner - comment letter	2
DOIPS0065374	DOIPS0065374	4th paragraph	Board of Laramie County Commissioners - comment letter	2
DOIPS0065441	DOIPS0065441-42	Last paragraph	Washakie County Commissioners - comment letter	2
DOIPS0065646	DOIPS0065647	Paragraph labeled as "2."	Petro-Hunt LLC - comment letter	2
DOIPS0065669	DOIPS0065670	1st & last full paragraphs	Heitkamp, Heidi - Candidate for the US Senate for North Dakota - comment letter	2
DOIPS0065683	DOIPS0065686	1st full paragraph	Stewart, Cody - Energy Advisor to the Governor of Utah - comment letter	2
DOIPS0065759	DOIPS0065760	3rd paragraph	Mesa County, Colorado, Board of County Commissioners - comment letter	2
DOIPS0065892	DOIPS0065895-96	Last paragraph	Industrial Commission of North Dakota - comment letter	2
DOIPS0066528	DOIPS0066530	1st & 2nd full paragraphs	Gene R. George & Associates, on behalf of Yates Petroleum Corp. - comment letter	2
DOIPS0067101	DOIPS0067101	Section "Wyoming State Rules"	Sweetwater County Board of County Commissioners - comment letter	2
DOIPS0138518	DOIPS0138518	1st paragraph	Larsen, Lloyd - comment letter	2
DOIPS0179197	DOIPS0179197	1st paragraph	Vorys on behalf of the Ohio Oil and Gas Association - comment letter	3
DOIPS0179197	DOIPS0179198-200	Section II A.	Vorys on behalf of the Ohio Oil and Gas Association - comment letter	3

DOIPS0301182	DOIPS0301184	Section 2 c.	Black Hills Exploration and Production and Midstream LLC - comment letter	4
DOIPS0301182	DOIPS0301185	Section 5 b.	Black Hills Exploration and Production and Midstream LLC - comment letter	4
DOIPS0301298	DOIPS0301301-02	Paragraph labeled as "2."	National Association of Manufacturers - comment letter	4
DOIPS0301566	DOIPS0301569	1st paragraph	America's Natural Gas Alliance & The American Exploration & Production Council - comment letter	4
DOIPS0364896	DOIPS0364899	Section II A 2	Crescent Point Energy Corp. - comment letter	5
DOIPS0365270	DOIPS0365270-71	Last paragraph	Institute for Energy Research - comment letter	5
DOIPS0365277	DOIPS0365277-78	Last paragraph	Devon Energy Corporation - comment letter	5
DOIPS0365277	DOIPS0365278	1st full paragraph	Devon Energy Corporation - comment letter	5
DOIPS0365277	DOIPS0365279	1st & 2nd bulleted paragraphs	Devon Energy Corporation - comment letter	5
DOIPS0365277	DOIPS0365284	Section III a.	Devon Energy Corporation - comment letter	5
DOIPS0389247	DOIPS0389248	Section I, 1st paragraph	QEP Energy Company - comment letter	5
DOIPS0389297	DOIPS0389302	Section "F."	Mountain States Legal Foundation - comment letter	5
DOIPS0389508	DOIPS0389510	2nd full paragraph	Coalition of Local Governments - comment letter	5
DOIPS0435640	DOIPS0435640-41	3rd full paragraph & last 2 paragraphs	Western Governors' Association - comment letter	5

DOIPS0435703	DOIPS0435704	1 st & 2 nd paragraphs under section beginning “BLM should examine...”	Wyoming County Commissioners Association - comment letter	5
DOIPS0435737	DOIPS0435737	2nd paragraph	Office of the Governor, State of Montana - comment letter	5
DOIPS0435877	DOIPS0435877	2nd paragraph	Hoeven, John; Heitkamp, Heidi; Cramer, Kevin - comment letter	5

CONCLUSION

For the reasons set forth in the States’ Motion for Preliminary Injunction (Doc. 32), as supported by the above citations to the record, the States request that the Court enter an order enjoining the final rule entitled Oil and Gas; Hydraulic Fracturing on Federal and Indian Lands published at 80 Fed. Reg. 16128 (March 26, 2015), during the pendency of this litigation.

DATED this 18th day of September, 2015.

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CERTIFICATE OF SERVICE

I hereby certify that on the 18th day of September, 2015, I filed the foregoing with the Clerk of Court using the Court's CM/ECF system, which will serve a Notice of Electronic Filing of the same on the parties.

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