

Exhibit A

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**UNITED STATES DEPARTMENT OF THE INTERIOR
OFFICE OF HEARINGS AND APPEALS
BOARD OF LAND APPEALS**

WESTERN WATERSHEDS PROJECT,
CENTER FOR BIOLOGICAL
DIVERSITY, and AMERICAN BIRD
CONSERVANCY,

Appellants,

v.

BUREAU OF LAND MANAGEMENT,

Respondent.

IBLA No. 2018-0013

Appeal of September 2017 Competitive Oil
and Gas Lease Sale Decision Record,
Finding of No Significant Impact, and
Environmental Assessment (DOI-BLM-
UT-W020-2017-0001-EA)

SUPPLEMENTAL DECLARATION OF COLYN KILMER

I, Colyn Kilmer, declare as follows:

1. On October 27, 2017, I executed a Declaration in this case regarding my membership and employment with CBD, my personal interests in the lease sale area and surrounding land, and how these interests would be adversely affected by the decisions challenged in this appeal. I submit this Supplemental Declaration in support of Appellants’ Response in Opposition to BLM’s Motion to Dismiss. The purpose of this supplemental

declaration is to provide the Court with additional information concerning my use of and interests in the land and resources at issue.

2. Attached as **Exhibit 1** to this Supplemental Declaration is a Google Map I annotated to show the lease sale area in relationship to where I grew up and where my mom still lives. The map illustrates the close proximity of my home to that area.

3. I highlighted highway 132 to show that it runs through parcel 001 and just to the north of parcel 002. Over the years, I have taken many scenic drives along highway 132 as it is a relatively quiet two-lane road with not too much traffic and beautiful scenery. There are dirt roads along the way that I have pulled off on just to be able to sit and enjoy the environment, eat a sandwich or let the dogs run around. I also like to see what wildlife might be out and about. This is my form of recreation; it doesn't involve fancy gear or much exertion, but it makes my soul happy. I'm sure the roads were numbered, but I honestly don't remember what the numbers were; just wherever seemed like a good place to get off the highway and find some solitude.

4. I have also taken numerous scenic drives on Interstate 15, which passes through parcel 006. It may sound strange to speak of a scenic drive on an Interstate, but that section running between the San Pitch Mountains to the east and the Sheeprocks/West Hills to the west is especially impressive.

5. I created the map to also show that this area is all part of a region I've spent a lot of time in. When you get up into the mountains between Levan and Wales, you can see west a long way, over into the West Hills and Sheeprocks. So in this way, the area, though it's a pretty big one, is connected through the viewshed.

6. Another thing I'd like to point out is that oil and gas development has far-reaching impacts that are not neatly contained within parcel lines on a map. The oil and gas development

that I've experienced in Uintah County creates noise pollution, air pollution and traffic; none of which are successfully confined to boundaries on map. Huge swaths of land are scraped clean for pump and storage pads and the roads that lead to them are wide and heavily trafficked. Anyone and anything within the not-so-close proximity to these areas is negatively impacted; not just those within the discrete perimeters of the project parcels.

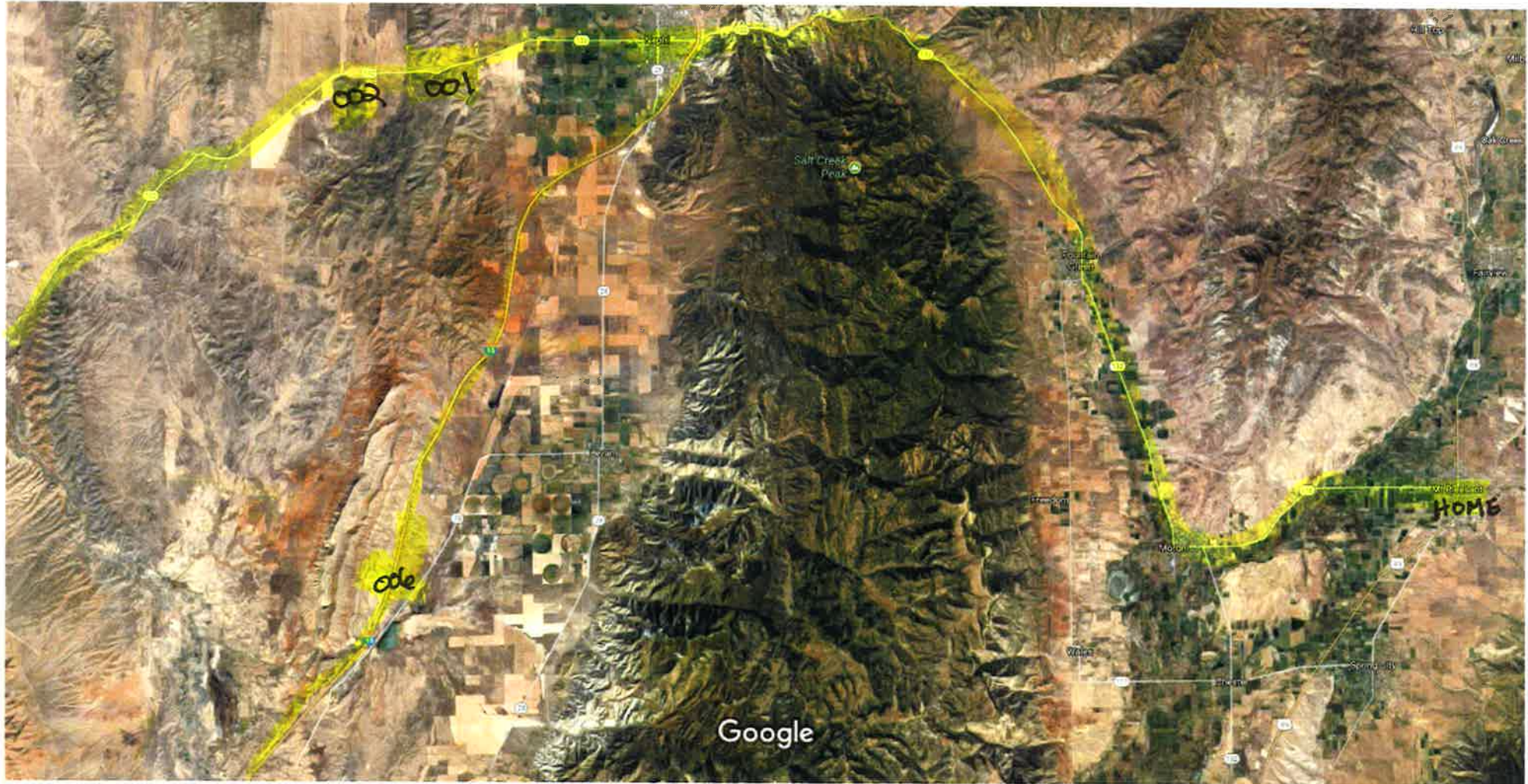
7. I consider this area my home and it feels like a violation for the destructive element of oil and gas development to be inserted into it. The air pollution alone will not stay confined to these 9 parcels.

8. To re-cap, I have traveled in and very much enjoyed the scenic and recreational value (and sense of place and home) found within or directly adjacent to parcels 001, 002 and 006, and this value would be drastically diminished by oil and gas leasing. I fully plan to return to these parcels within the near future, as soon as I can get enough vacation, perhaps in the spring when I visit my mom.

I declare under penalty of perjury that the foregoing is true and correct. Executed on this 15th day of November, 2017 in Oakland, California.

/s/ Colyn Kilmer

Colyn Kilmer



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