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UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF IDAHO

WESTERN WATERSHEDS PROJECT, and
CENTER FOR BIOLOGICAL DIVERSITY,

Plaintiffs,

v.

RYAN K. ZINKE, Secretary of Interior;
DAVID BERNHARDT, Deputy Secretary
of Interior; and UNITED STATES
BUREAU OF LAND MANAGEMENT,
an agency of the United States,

Defendants.

Case No. 1:18-cv-00187-REB

**DECLARATION OF LAIRD LUCAS IN
SUPPORT OF PLAINTIFFS’ MOTION
FOR PRELIMINARY INJUNCTION**

I, Laurence (“Laird”) J. Lucas, declare:

1. I am co-counsel of record for Plaintiffs in this case. I have personal knowledge of the matters set forth in this declaration.

2. The following attached exhibits are true and correct copies of publicly available documents, which were obtained from Department of Interior, BLM or other government websites, or from Westlaw, to which Plaintiffs cite in their Opening Brief in Support of Motion for Preliminary Injunction:

- Exhibit A: IM 2018-034, *Updating Oil and Gas Leasing Reform – Land Use Planning and Lease Parcel Reviews* (Jan. 31, 2018).
- Exhibit B: IM 2010-117, *Oil and Gas Leasing Reform – Land Use Planning and Lease Parcel Reviews* (May 17, 2010).
- Exhibit C: BLM Oil and Gas Adjudication Handbook, H-3100-1-Oil and Gas Leasing (1985),
- Exhibit D: BLM NEPA Handbook, H-1790-1 (Jan. 2008),
- Exhibit E: Deputy Sec’y David J. Hayes, U.S. Dep’t of the Interior, Report To Secretary Ken Salazar Regarding The Potential Leasing Of 77 Parcels In Utah (June 11, 2009).
- Exhibit F: BLM Colorado letter denying March 24, 2018 Request for Extension of Time to comment
- Exhibit G: BLM Wyoming News Release May 24, 2018

I declare under penalty of perjury pursuant to the laws of the United States that the foregoing is true and correct. Executed this 6th day of July, 2018 in Boise, Idaho

/s/ Laird J. Lucas
Laurence (“Laird”) J. Lucas