

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

POWDER RIVER BASIN RESOURCE
COUNCIL, WESTERN WATERSHEDS
PROJECT,

Plaintiffs,

v.

U.S. DEPARTMENT OF THE INTERIOR,
U.S. BUREAU OF LAND MANAGEMENT,

Defendants.

Case No. 1:22-cv-2696-TSC

DECLARATION OF LELAND TURNER

I, Leland Turner, hereby declare as follows:

1. The following facts are personally known to me, and if called as a witness, I could and would competently testify thereto. I am over 18 years of age.
2. My wife, Karen, and I are active members of the Powder River Basin Resource Council (PRBRC). We have been members of PRBRC since 2001.
3. We joined PRBRC because it represents our interests in having a clean and healthful environment in northeastern Wyoming, including our interests in protecting our air quality and healthy soils and rangeland. I support PRBRC's efforts to protect Wyoming's air, land, and water quality.
4. We live on a ranch near the town of Wright, Wyoming. My grandfather homesteaded the ranch in 1918, and the land has been in my family ever since. I was born and

raised in Wyoming and have lived here my whole life, except for a few years I spent in Montana. Karen and I raised our children here.

5. Our home is roughly 15 miles to the North of the Converse County Project boundary, in Campbell County. We graze cattle on the ranch, and I also own active grazing permits in the Thunder Basin National Grassland. We also operate sheep. The ranching business is our livelihood.

6. This area has one of the oldest established oil fields in the states. Thus far, we have had mostly fly-by-night operators that come in and leave in a few months or years. We have never seen development on the scale of this Converse County Project.

7. We have had some oil and gas activity on our property over the years, and personally own some mineral rights. Devon Energy, one of the companies involved with the Converse County Project, has drilled a well into our minerals. We thought we had leased mineral rights to them, but they backed out at the last minute. They still drilled the well and are producing, but we have not been able to get any accounting for what that well is producing or any compensation from Devon. This was on split-estate minerals we own in Converse County.

8. Given my prior experience with oil and gas development, I am deeply concerned about the impacts the Converse County Project will have on the health of my family, livestock, water, wildlife, and the broader community.

9. Air pollution is already a problem here, from coal mining and other industrial development. It gets so bad sometimes you can smell it. On our drive to Gillette, looking out into the horizon, we see a layer of smog blanketing the sky. We live just 20 miles from Pumpkin Buttes, but there are many days you can't see them because of how air pollution has impacted visibility. I fear what that means for our health. We used to enjoy crystal clear blue skies and far-

as-the-eye-can-see landscapes around my family's ranch. That has all changed with the smog and haze, to the detriment of our quality of life. I am aware that the Converse County Project will emit significant quantities of air pollutants, so I fear these problems will only become worse. I wish BLM had done more to control the air pollution from this project.

10. Oil and gas development brings with it another horrible air quality problem, which is dust. You can't imagine how bad the dust gets from the 24-hour-a-day truck traffic from these oil companies. The companies are supposed to do dust control, but in my experience, that is not occurring. On our road here, the dust pollution can get so bad that cabin air filters max out. This is a hazard for our health and for drivers along our unpaved county roads. It can also negatively impact my ranching business, by causing health problems for my cattle or settling on the grass somewhere and stunting plant growth.

11. Combined with the lack of visibility from the dust, the constant stream of those trucks makes road conditions hazardous. There are times you can hardly get on the roads. We've also had several windshields broken out from these trucks, replaced them, then had the same windshield broken soon after. In addition to unsafe driving conditions, the continual oil and gas traffic has also just about destroyed our road here. The county has been trying different things, but you take heavy truck traffic on these unpaved roads, and there are bound to be problems.

12. The Converse County Project is bigger than any oil and gas project we've seen in this area, and I fear it will only make these problems much worse. All that heavy truck traffic 24 hours a day will be a daily stress.

13. I also have serious concerns about water impacts. I don't think people even realize the most valuable resource we have in Wyoming is water. Like many parts of the state, this region is incredibly dry. Yet these oil companies run through so much water for drilling these

wells and fracking them, and our groundwater is not being replenished. Our springs and aquifers and drying up.

14. On our ranch, the springs no longer run year-round, so our only reliable source of water is wells that we pump. Even those are drying up. Water levels have dropped so we've gradually had to dig our wells deeper and deeper, hundreds of feet beyond where we used to stop. When we built our home, we drilled a new water well, but after the drilling and fracking increased in the area, we can no longer run hoses all day long at the same time from that well.

15. Water is essential to our ranching operations, both at the ranch and in our lease areas on Thunder Basin National Grassland. Water access is also a safety concern. We live over 20 miles from the closest fire department, and it takes over an hour to get there. Simply put, our lives depend on water.

16. The Converse County Project will use an enormous quantity of water. Living so close, I worry about the dewatering of our aquifers that may impact my wells or springs.

17. Water contamination is another concern of mine. I recall a time my mother set out a cup for me to make instant coffee, and when I put the powder in the cup, it turned instantly black. There was a skim that looked like oil in the cup. We had to drill another well for her after that. Some oil wells had been drilled nearby, and I'm convinced those were responsible. Her water had always been so good. It's only a matter of time before similar incidents pop up around our community from this Converse County Project.

18. I also regularly visit areas that will be impacted by the Converse County Project, like the Thunder Basin National Grassland, and I enjoy seeing the pronghorn antelope, elk, and other wildlife in the area. This project will bring major physical changes to the landscape, taking away from its natural beauty and the enjoyment I derive from it. Wildlife will also suffer. The

deer and antelope populations in our region have already been decimated. I fear that this project will drive wildlife away and make it harder for me to see them as I go about daily life.

19. I support PRBRC's efforts to hold the Bureau of Land Management responsible for doing all it can to prevent the negative impacts of the Converse County Project on our community. If this project moves forward as planned, it will take a toll on our health, our air, our water, our wildlife, our livelihoods, and our rural quality of life. A favorable ruling in this case would hold BLM accountable for doing a better job managing the impacts of this project and protecting our quality of life into the future.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief, and based on my personal experiences.

Signed this 13th day of March, 2023 in Campbell County, Wyoming.

/s/ Leland Turner

Leland Turner