



Colorado Native Plant Society

November 1, 2018

Dear Sir or Madam,

I am writing as the official representative of the Colorado Native Plant Society to request that you remove following leases from your December 2018 lease sale. These leases contain populations of rare plant species that have been documented by collections in herbaria across the United States, and they lie within the boundaries of the lease indicated:

Grand Junction Field Office

Lease Serial Number

Rare Plant Documented Within the Boundaries of the Lease

COC79310

Thelypodiopsis juniperorum (Juniper tumble mustard) Globally Ranked G2 and State Ranked S2

COC79312

Physaria parviflora (Piceance bladderpod) Globally Ranked G2 and State Ranked S2

Argillochloa dasyclada (False ricegrass) Globally Ranked G3 and State Ranked S3

COC79315

Physaria parviflora (Piceance bladderpod) Globally Ranked G2 and State Ranked S2

COC79317

Physaria parviflora (Piceance bladderpod) Globally Ranked G2 and State Ranked S2

White River Field Office

Lease Serial Number

Rare Plant Documented Within the Boundaries of the Lease

COC79336

Astragalus duchesnensis (Duchesne milkvetch) Globally Ranked G3 and State Ranked S1S2

COC79344

Monardella odoratissima (mountain wild mint) Globally Ranked G4G5 and State Ranked S2

Nuttallia multicaulis (Many- stem stickleaf) Globally Ranked G3 and State Ranked S3

COC79345

Physaria subumbellata (parasol bladderpod) Globally Ranked G3 and State Ranked S2

COC79347

Physaria subumbellata (parasol bladderpod) Globally Ranked G3 and State Ranked S2

Penstemon fremontii var. *glabrescens* (Fremont's beardtongue) Globally Ranked G3G4T2 and State Ranked S2

Cirsium barnebyi (Barneby's thistle) Globally Ranked G3G4 and State Ranked S3

If you are unwilling to remove these leases from your lease sale we would strongly request that you place surface stipulations in the lease to protect these valuable natural resources. The stipulations should require that the lessee conduct plant inventories in the leased area, map the presence of the rare plants, and stipulate that a 100-meter buffer be created between the plants and all roads, well pads, and oil and gas infrastructure as recommended in Best Management Practices (BMPs) for oil and gas development.

Sincerely,

Mo Ewing
Chairman, Conservation Committee
Colorado Native Plant Society