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UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

KELSEY CASCADIA ROSE JULIANA;
XIUHTEZCATL TONATIUH M., through
his Guardian Tamara Roske-Martinez; et al.

Plaintiffs,

v.

The UNITED STATES OF AMERICA;
DONALD TRUMP, in his official capacity as
President of the United States; et al.,

Defendants.

Case No.: 6:15-cv-01517-TC

PLAINTIFFS' REQUESTS FOR
ADMISSIONS TO DEFENDANT THE
UNITED STATES DEPARTMENT OF THE
INTERIOR

PROPOUNDING PARTIES: PLAINTIFFS

**RESPONDING PARTY: DEFENDANT THE UNITED STATES
DEPARTMENT OF THE INTERIOR**

SET NO: ONE

Pursuant to Federal Rule of Civil Procedure 36, Plaintiffs hereby request that Defendant the United States Department of the Interior (“Defendant”) respond fully, in writing and under oath, to the following Requests for Admissions, and serve such responses on counsel for Plaintiffs within thirty (30) days after service of these Requests for Admissions.

I. DEFINITIONS

A. As used herein, the term “AUM” is an abbreviation of Animal Unit Month, the amount of forage necessary for the sustenance of one cow or its equivalent for a period of one month.¹

B. As used herein, “BCF” is an abbreviation for one-billion cubic feet.

C. As used herein, “DANGEROUS ANTHROPOGENIC INTERFERENCE WITH THE CLIMATE SYSTEM” refers to the United Nations Framework Convention on Climate Change treaty obligation of nation-states to avoid dangerous climate change, a treaty signed and ratified by the UNITED STATES and shall include “large global warming,” “anthropogenic threats to the stability of the climate,” “large-scale climate change,” “dangerous human-made interference with climate,” “the worst impacts of climate change,” and “unacceptable concentration of greenhouse gases.”

D. As used herein, the term “DEPARTMENT OF THE INTERIOR” shall mean Defendant United States Department of the Interior, including all offices, bureaus, agencies,

¹ 43 C.F.R. § 4100.0-5 (2017).

departments, and programs within the United States Department of the Interior.

E. As used herein, “DEFENDANTS” shall mean the defendants in this action, including: The UNITED STATES OF AMERICA; DONALD TRUMP, in his official capacity as President of the United States; The OFFICE OF THE PRESIDENT OF THE UNITED STATES; CHRISTY GOLDFUSS and any Successor, in her official capacity as Director of Council on Environmental Quality; JOHN MICHAEL MULVANEY, in his official capacity as Director of the Office of Management and Budget; DR. JOHN HOLDREN and any Successor, in his official capacity as Director of the Office of Science and Technology Policy; The UNITED STATES DEPARTMENT OF ENERGY; JAMES RICHARD PERRY, in his official capacity as Secretary of Energy; The UNITED STATES DEPARTMENT OF THE INTERIOR; RYAN ZINKE, in his official capacity as Secretary of Interior; The UNITED STATES DEPARTMENT OF TRANSPORTATION; ELAINE CHAO, in her official capacity as Secretary of Transportation; The UNITED STATES DEPARTMENT OF AGRICULTURE; SONNY PERDUE, in his official capacity as Secretary of Agriculture; The UNITED STATES DEPARTMENT OF COMMERCE; WILBUR ROSS, in his official capacity as Secretary of Commerce; The UNITED STATES DEPARTMENT OF DEFENSE; JAMES NORMAN MATTIS, in his official capacity as Secretary of Defense; The UNITED STATES DEPARTMENT OF STATE; MIKE POMPEO, in his official capacity as Secretary of State; The UNITED STATES ENVIRONMENTAL PROTECTION AGENCY; EDWARD SCOTT PRUITT, in his official capacity as Administrator of the ENVIRONMENTAL PROTECTION AGENCY, and any and all of each DEFENDANT’s current or former principals, predecessors, officers, directors, employees, agents, attorneys, consultants, and other representatives.

F. As used herein, the term “FEDERAL LANDS” shall mean any land and interest

in land owned by the United States within the several States and administered by the Secretary of the Interior, without regard to how the United States acquired ownership. The term “FEDERAL LANDS” shall include all land and interests in land owned by the United States which are subject to the mineral leasing laws, including mineral resources or MINERAL ESTATES reserved to the United States in the conveyance of a surface or non-mineral estate.²

G. As used herein, the term “FLARED” shall mean the use of an open-air flare stack or flare pit designed for the combustion of natural gas leaving a pressurized production vessel (such as a separator or heater-treater) that is not a storage vessel.³

H. As used herein, the term “GAS HYDRATES” means a form of concentrated natural gas, primarily methane, frozen under the surface of the ocean, typically at high pressure and low temperature, which reverts back to water and natural gas when either warmed or depressurized.⁴

I. As used herein, the term “INDIAN COUNTRY” shall mean “(a) all land within the limits of any Indian reservation under the jurisdiction of the United States Government, notwithstanding the issuance of any patent, and, including rights-of-way running through the reservation, (b) all dependent Indian communities within the borders of the United States whether within the original or subsequently acquired territory thereof, and whether within or without the limits of a state, and (c) all Indian allotments, the Indian titles to which have not been extinguished, including rights-of-way running through the same.”⁵

J. As used herein, the term “LEAK” shall mean a release of natural gas from a

² 30 U.S.C. § 1702(1) (2012).

³ 43 C.F.R. § 3179.3 (2017).

⁴ *Methane Hydrate*, Dep’t of Energy, <https://www.energy.gov/fe/science-innovation/oil-gas-research/methane-hydrate> (last visited May 3, 2018).

⁵ 18 U.S.C. § 1151 (2012).

component that is not associated with normal operation of the component, when such release is: (1) a visible hydrocarbon emission detected by use of an optical gas imaging instrument; (2) at least 500 ppm of hydrocarbon detected using a portable analyzer or other instrument that can measure the quantity of the release; or (3) visible bubbles detected using soap solution. Releases due to normal operation of equipment intended to vent as part of normal operations, such as gas-driven pneumatic controllers and safety release devices, are not considered leaks unless the releases exceed the quantities and frequencies expected during normal operations. Releases due to operator errors or equipment malfunctions or from control equipment at levels that exceed applicable regulatory requirements, such as releases from a thief hatch left open, a leaking vapor recovery unit, or an improperly sized combustor, are considered leaks.⁶

K. As used herein, “MCF” is an abbreviation for one-thousand (100) cubic feet.

L. As used herein, the term “MINERAL ESTATE” refers to onshore federal minerals that are part of the responsibilities of the Bureau of Land Management (BLM). The onshore federal mineral acreage approximates the sum of “Federal Surface Lands” acres and “Split Estate Federal Minerals.” Federal surface lands include both the public domain and acquired lands of all federal agencies. With the exception of an estimated four million acres of the acquired lands, federal mineral rights exist in all federal lands. The term “Split Estate Federal Minerals” refers to federal mineral rights under private surface lands.

M. As used herein, the term “NATIONAL WILDLIFE REFUGE SYSTEM LANDS” shall mean “areas that are administered by the Secretary [of the Interior] for the conservation of fish and wildlife, including species that are threatened with extinction, all lands, waters, and interests therein administered by the Secretary as wildlife refuges, areas for the protection and

⁶ 43 C.F.R. § 3179.3 (2017).

conservation of fish and wildlife that are threatened with extinction, wildlife ranges, game ranges, wildlife management areas, or waterfowl production areas.”⁷

N. As used herein, the term “OUTER CONTINENTAL SHELF” shall mean “all submerged lands lying seaward and outside of the area of lands beneath navigable waters as defined in Section 1301 [of the Outer Continental Shelf Lands Act], and of which the subsoil and seabed appertain to the United States and are subject to its jurisdiction and control”.⁸

O. As used herein, the term “PERSON” shall mean all individuals, entities, firms, organizations, groups, committees, regulatory agencies, governmental entities, business entities, corporations, partnerships, trusts, and estates.

P. As used herein, the phrase “ROYALTY-IN-KIND PROGRAM” refers to the DEPARTMENT OF THE INTERIOR’s now-defunct program in which companies paid lease royalties in oil and gas volumes rather than cash to the United States government. The United States government then sold the oil and gas products on the open market. The Program was terminated in 2009.⁹

II. INSTRUCTIONS

A. Each Request for Admission shall be answered separately and fully in writing under oath by the Defendant, unless it is objected to, in which event Defendant shall state its reasons for objection and shall answer to the extent the Request for Admission is not

⁷ National Wildlife Refuge Administration Act, 16 U.S.C. § 668dd(a)(1) (2012).

⁸ Outer Continental Shelf Lands Act, 43 U.S.C. § 1331(a) (2012).

⁹ 42 U.S.C. § 15902 (2012); U.S. Dep’t of the Interior, Office of Inspector Gen., No. C-IN-MMS-0007-2008, *Minerals Management Service: Royalty-in-Kind Program’s Oil Volume Verification Process* (2010), <https://www.doioig.gov/sites/doioig.gov/files/2010-I-0021.pdf>; *Interior Completing Close-out of Royalty in Kind Program*, Dep’t of the Interior (Sept. 24, 2010), <https://www.doi.gov/news/pressreleases/Interior-Completing-Close-Out-of-Royalty-in-Kind-Program>.

objectionable.

B. The answers are to be signed by the person making them, and the objections signed by the attorney making them.

C. All grounds for an objection to a Request for Admission shall be stated with specificity. Any ground not stated in a timely objection is waived unless the party's failure to object is excused by the court for good cause shown.

D. The subject matter of these Requests for Admissions shall be deemed admitted unless, within thirty (30) days after service of these Requests for Admission, Defendant serves upon Plaintiffs a written answer or objection addressed to the matter, signed by Defendant or by Defendant's attorney.

E. If the answer to a Request for Admission is a denial, it shall specifically deny the matter set forth in detail, and the reasons why Defendant cannot admit the matter requested.

F. A denial shall fairly meet the substance of the Request for Admission and, when good faith requires that Defendant qualify an answer or deny only a part of the matter of which an admission is requested, Defendant shall specify the portion that is true and qualify or deny the remainder of the Request for Admission.

G. If Defendant considers that a matter upon which an admission has been requested presents a genuine issue for trial, Defendant may not, on that ground alone, object to the Request for Admission.

H. A source for the admissions of fact sought is provided for the ease of Defendant's reference in the footnotes to the Requests for Admissions.

III. REQUESTS FOR ADMISSIONS

Plaintiffs request that Defendant admits that each of the following statements is true:

REQUEST FOR ADMISSION NO. 1:

The DEPARTMENT OF THE INTERIOR manages, through the BLM, 248.3 million surface and subsurface acres of FEDERAL LAND.¹⁰

ANSWER:

REQUEST FOR ADMISSION NO. 2:

The DEPARTMENT OF THE INTERIOR manages, through BLM, 700 million acres of onshore federal subsurface MINERAL ESTATE.¹¹

ANSWER:

¹⁰ Carol Hardy Vincent et al., Cong. Research Serv., R42346, *Federal Land Ownership: Overview and Data* 4–5 (2017), <https://fas.org/sgp/crs/misc/R42346.pdf>; accord U.S. Dep’t of the Interior, Bureau of Land Mgmt., *Public Land Statistics 2015*, at 7–8 (2016), <https://www.blm.gov/sites/blm.gov/files/documents/files/Public%20Land%20Statistics2015%20%281%29.pdf>.

¹¹ The onshore federal mineral acreage approximates the sum of “Federal Surface Lands” acres and “Split Estate Federal Minerals” acres. See U.S. Dep’t of the Interior, Bureau of Land Mgmt., *Public Land Statistics 2015*, at 7–8 (2016), <https://www.blm.gov/sites/blm.gov/files/documents/files/Public%20Land%20Statistics2015%20%281%29.pdf>.

REQUEST FOR ADMISSION NO. 3:

The DEPARTMENT OF THE INTERIOR, through the U.S. Fish & Wildlife Service (FWS), manages 89.1 million acres of FEDERAL LAND.¹²

ANSWER:

REQUEST FOR ADMISSION NO. 4:

The DEPARTMENT OF THE INTERIOR, through the National Park Service (NPS), manages 79.9 million acres of FEDERAL LAND.¹³

ANSWER:

REQUEST FOR ADMISSION NO. 5:

The DEPARTMENT OF INTERIOR “plays a significant role in meeting the President’s challenge to manage America’s resources to responsibly produce more energy at home.”¹⁴

ANSWER:

¹² Carol Hardy Vincent et al., Cong. Research Serv., R42346, *Federal Land Ownership: Overview and Data 4–5* (2017), <https://fas.org/sgp/crs/misc/R42346.pdf>.

¹³ Carol Hardy Vincent et al., Cong. Research Serv., R42346, *Federal Land Ownership: Overview and Data 4–5* (2017), <https://fas.org/sgp/crs/misc/R42346.pdf>.

¹⁴ Dep’t of the Interior, *New Energy Frontier*, at DH-27 (2012), https://www.doi.gov/sites/doi.opengov.ibmcloud.com/files/uploads/FY2013_BIB_DH027.pdf.

REQUEST FOR ADMISSION NO. 6:

In 2012, oil and gas development on FEDERAL LANDS and the OUTER CONTINENTAL SHELF accounted for about 24% of the Nation's energy supply.¹⁵

ANSWER:

REQUEST FOR ADMISSION NO. 7:

In 2012, the DEPARTMENT OF INTERIOR stated that “[d]espite projected growth in renewable energy, fossil fuels, mostly petroleum and natural gas, are expected to remain a significant source of energy used in the United States for some time to come.”¹⁶

ANSWER:

REQUEST FOR ADMISSION NO. 8:

In 2013, the UNITED STATES was the world's second largest coal producer after China.¹⁷

ANSWER:

¹⁵ Dep't of the Interior, *New Energy Frontier*, at DH-27 (2012), https://www.doi.gov/sites/doi.opengov.ibmcloud.com/files/uploads/FY2013_BIB_DH027.pdf.

¹⁶ Dep't of the Interior, *New Energy Frontier*, at DH-34 (2012), https://www.doi.gov/sites/doi.opengov.ibmcloud.com/files/uploads/FY2013_BIB_DH027.pdf.

¹⁷ *How it Works: Coal*, U.S. Dep't of the Interior, Nat'l Resources Revenue Data, <https://revenue.data.doi.gov/how-it-works/coal/> (last visited May 3, 2018).

REQUEST FOR ADMISSION NO. 9:

The UNITED STATES has significant available coal reserves, including 19.7 billion short tons of recoverable reserves in active mines, and an additional 479.9 billion short tons that could be mined with current technologies.¹⁸

ANSWER:

REQUEST FOR ADMISSION NO. 10:

As of Fiscal Year 2014, the DEPARTMENT OF THE INTERIOR, through the BLM, administered 310 coal leases encompassing over 475,692 acres in ten states on FEDERAL LANDS, which authorize the extraction of an estimated 7.75 billion tons of recoverable coal.¹⁹

ANSWER:

REQUEST FOR ADMISSION NO. 11:

Without a coal lease issued by the DEPARTMENT OF THE INTERIOR, private entities could not legally extract coal from FEDERAL LANDS that are managed by the DEPARTMENT OF THE INTERIOR.

ANSWER:

¹⁸ *How it Works: Coal*, U.S. Dep't of the Interior, Nat'l Resources Revenue Data, <https://revenue.data.doi.gov/how-it-works/coal/> (last visited May 3, 2018).

¹⁹ U.S. Dep't of the Interior, Secretarial Order No. 3338, *Discretionary Programmatic Environmental Impact Statement to Modernize the Federal Coal Program 2* (2016), https://www.blm.gov/sites/blm.gov/files/programs_energyandminerals_coalSO3338.pdf.

REQUEST FOR ADMISSION NO. 12:

Over the last decade, leases issued and administered by the DEPARTMENT OF THE INTERIOR have resulted in the production of over 4.4 billion tons of coal from FEDERAL LANDS.²⁰

ANSWER:

REQUEST FOR ADMISSION NO. 13:

More than 40% of all coal produced in the United States is extracted from FEDERAL LANDS managed by the DEPARTMENT OF THE INTERIOR.²¹

ANSWER:

REQUEST FOR ADMISSION NO. 14:

Coal produced from the Powder River Basin in Montana and Wyoming on FEDERAL LANDS accounts for over 85% of coal produced from FEDERAL LANDS.²²

ANSWER:

²⁰ U.S. Dep't of the Interior, Secretarial Order No. 3338, *Discretionary Programmatic Environmental Impact Statement to Modernize the Federal Coal Program 2* (2016), https://www.blm.gov/sites/blm.gov/files/programs_energyandminerals_coalSO3338.pdf.

²¹ *Energy Fast Facts*, Dep't of the Interior, <https://www.doi.gov/energy/fast-facts> (last visited May 3, 2018).

²² U.S. Dep't of the Interior, Secretarial Order No. 3338, *Discretionary Programmatic Environmental Impact Statement to Modernize the Federal Coal Program 2* (2016), https://www.blm.gov/sites/blm.gov/files/programs_energyandminerals_coalSO3338.pdf.

REQUEST FOR ADMISSION NO. 15:

Between 80–90% of the coal produced in the United States on FEDERAL LANDS is used for electricity generation within the United States.²³

ANSWER:

REQUEST FOR ADMISSION NO. 16:

Coal produced from FEDERAL LANDS was used to generate about 14% of electricity in the United States in 2015.²⁴

ANSWER:

REQUEST FOR ADMISSION NO. 17:

In 2017 coal-fired electricity made up 30% of energy generation in the United States.²⁵

ANSWER:

²³ See *Coal Data Browser*, U.S. Energy Info. Admin., <https://www.eia.gov/electricity/data/browser> (last visited May 3, 2018) (view pre-generated report “Total U.S. coal consumption, electric power sector.”).

²⁴ U.S. Dep’t of the Interior, Secretarial Order No. 3338, *Discretionary Programmatic Environmental Impact Statement to Modernize the Federal Coal Program 2* (2016), https://www.blm.gov/sites/blm.gov/files/programs_energyandminerals_coalSO3338.pdf.

²⁵ *Electricity Data Browser*, U.S. Energy Info. Admin., <https://www.eia.gov/electricity/data/browser> (last visited Mar. 11, 2018) (view pre-generated report “1.1 Net generation by energy source: total - all sectors.”).

REQUEST FOR ADMISSION NO. 18:

The programmatic Environmental Impact Statement issued by the DEPARTMENT OF THE INTERIOR in January 2017 was the first time the direct, cumulative and indirect environmental impacts of the Federal coal program had been fully analyzed under the National Environmental Policy Act since 1979.²⁶

ANSWER:

REQUEST FOR ADMISSION NO. 19:

In the DEPARTMENT OF THE INTERIOR's BLM's first Final Environmental Impact Statement of the Eastern Powder River Coal Basin of Wyoming in 1974 prepared under the National Environmental Policy Act, the BLM made the following statement: "Development of a number of coal mines, power plants and gasification plants, and disturbance of significantly large areas of land surface may cause significant changes that could detrimentally affect weather and climate."²⁷

ANSWER:

²⁶ U.S. Dep't of the Interior, Secretarial Order No. 3338, *Discretionary Programmatic Environmental Impact Statement to Modernize the Federal Coal Program 1* (2016), https://www.blm.gov/sites/blm.gov/files/programs_energyandminerals_coalSO3338.pdf.

²⁷ Bureau of Land Mgmt., 2 Final Environmental Impact Statement: Eastern Powder River Coal Basin of Wyoming (1974), https://eplanning.blm.gov/epl-front-office/projects/nepa/67005/82492/98469/EPRB_FEIS_Vol2.pdf.

REQUEST FOR ADMISSION NO. 20:

On January 31, 2018, Deputy Secretary of the Interior David Bernhardt made the following statement: “Oil and gas lease sales on public land directly support domestic energy production and the President’s energy dominance and job growth priorities for America.”²⁸

ANSWER:

REQUEST FOR ADMISSION NO. 21:

On January 4, 2018, Vincent DeVito, Counselor for Energy and Policy at the DEPARTMENT OF THE INTERIOR made the following statement: “By proposing to open up nearly the entire OCS for potential oil and gas exploration, the United States can advance the goal of moving from aspiring for energy independence to attaining energy dominance. This decision could bring unprecedented access to America’s extensive offshore oil and gas resources and allows us to better compete with other oil-rich nations.”²⁹

ANSWER:

²⁸ *BLM Oil and Gas Lease Sales Generate \$360 Million in 2017: Total Is Highest in Nearly a Decade*, Bureau of Land Mgmt. (Jan. 31, 2018), <https://www.blm.gov/press-release/blm-oil-and-gas-lease-sales-generate-360-million-2017>.

²⁹ *Press Release: Secretary Zinke Announces Plan for Unleashing America’s Offshore Oil and Gas Potential*, U.S. Dep’t of the Interior (Jan. 4, 2018), <https://www.doi.gov/pressreleases/secretary-zinke-announces-plan-unleashing-americas-offshore-oil-and-gas-potential>.

REQUEST FOR ADMISSION NO. 22:

Coal produced from FEDERAL LANDS is responsible for roughly 10% of United States greenhouse gas emissions.³⁰

ANSWER:

REQUEST FOR ADMISSION NO. 23:

Of the 700 million acres of the federal government's subsurface MINERAL ESTATE that the DEPARTMENT OF THE INTERIOR manages, about 570 million acres are available for coal leasing.³¹

ANSWER:

³⁰ U.S. Dep't of the Interior, Secretarial Order No. 3338, *Discretionary Programmatic Environmental Impact Statement to Modernize the Federal Coal Program 4* (2016), https://www.blm.gov/sites/blm.gov/files/programs_energyandminerals_coalSO3338.pdf.

³¹ *Coal*, Bureau of Land Mgmt., <https://www.blm.gov/programs/energy-and-minerals/coal> (last visited Mar. 6, 2018); *Coal Data*, Bureau of Land Mgmt., <https://www.blm.gov/programs/energy-and-minerals/coal/coal-data> (last visited Mar. 6, 2018).

REQUEST FOR ADMISSION NO. 24:

As of January 2018, the DEPARTMENT OF THE INTERIOR's BLM seeks to simplify and streamline the subsurface MINERAL ESTATE leasing process of Federal minerals under BLM administered surface, state-owned surface, and private surface estates to alleviate unnecessary impediments and burdens and to expedite the offering of lands for lease.³²

ANSWER:

REQUEST FOR ADMISSION NO. 25:

Without a lease issued and managed by the DEPARTMENT OF THE INTERIOR, private entities could not legally extract oil and gas from FEDERAL LANDS.

ANSWER:

REQUEST FOR ADMISSION NO. 26:

In 2016, 27,207,018 acres of onshore FEDERAL LANDS were under oil and gas lease,³³ with 12,771,829 acres in production.³⁴

ANSWER:

³² Bureau of Land Mgmt., IM 2018-034, *Instruction Memorandum: Updating Oil and Gas Leasing Reform – Land Use Planning and Lease Parcel Reviews* (Jan. 31, 2018), <https://www.blm.gov/policy/im-2018-034>.

³³ *Oil and Gas Statistics*, Bureau of Land Mgmt., <https://www.blm.gov/programs/energy-and-minerals/oil-and-gas/oil-and-gas-statistics> (last visited May 3, 2018) (navigate to “Table 2 Acreage in Effect.”).

³⁴ *Oil and Gas Statistics*, Bureau of Land Mgmt., <https://www.blm.gov/programs/energy-and-minerals/oil-and-gas/oil-and-gas-statistics> (last visited May 3, 2018) (navigate to “Table 6 Acreage of Producing Leases.”).

REQUEST FOR ADMISSION NO. 27:

In calendar year 2011, DEPARTMENT OF INTERIOR, through BLM, held 32 lease sales covering 4.4 million acres, including three of the largest sales in the bureau's history in Montana, Utah, and Wyoming.³⁵

ANSWER:

REQUEST FOR ADMISSION NO. 28:

As of 2016, about 113 million acres of onshore FEDERAL LANDS are open and accessible for oil and gas development according to the Congressional Research Service.³⁶

ANSWER:

REQUEST FOR ADMISSION NO. 29:

During Fiscal Year 2015, the DEPARTMENT OF THE INTERIOR, through the BLM, leased about 32 million acres of FEDERAL LANDS to entities to extract oil and gas.³⁷

ANSWER:

³⁵ Dep't of the Interior, *New Energy Frontier*, at DH-36 (2012), https://www.doi.gov/sites/doi.opengov.ibmcloud.com/files/uploads/FY2013_BIB_DH027.pdf.

³⁶ Marc Humphries, Cong. Research Serv., R42432, *U.S. Crude Oil and Natural Gas Production in Federal and Nonfederal Areas 6* (2016), <https://fas.org/sgp/crs/misc/R42432.pdf>.

³⁷ *BLM Releases Statistics on Oil and Gas Activity on Federal, Indian Lands*, U.S. Dep't of the Interior, Bureau of Land Mgmt. (Apr. 11, 2016), <https://www.blm.gov/press-release/blm-releases-statistics-oil-and-gas-activity-federal-indian-lands-0>.

REQUEST FOR ADMISSION NO. 30:

During Fiscal Year 2015, the DEPARTMENT OF THE INTERIOR, through the BLM, managed 23,770 producing oil and gas leases, authorizing the production of approximately 100,000 oil and gas wells on FEDERAL LANDS.³⁸

ANSWER:

REQUEST FOR ADMISSION NO. 31:

In Fiscal Year 2015, 21% of the oil produced in the United States was produced on FEDERAL LANDS.³⁹

ANSWER:

REQUEST FOR ADMISSION NO. 32:

In Fiscal Year 2015, fossil fuel energy produced on FEDERAL LANDS managed by the DEPARTMENT OF THE INTERIOR included 782 million barrels of crude oil, five trillion cubic feet of natural gas, and 421 million tons of coal.⁴⁰

ANSWER:

³⁸ *BLM Releases Statistics on Oil and Gas Activity on Federal, Indian Lands*, U.S. Dep't of the Interior, Bureau of Land Mgmt. (Apr. 11, 2016), <https://www.blm.gov/press-release/blm-releases-statistics-oil-and-gas-activity-federal-indian-lands-0>.

³⁹ Marc Humphries, Cong. Research Serv., R42432, *U.S. Crude Oil and Natural Gas Production in Federal and Nonfederal Areas 1* (2016), <https://fas.org/sgp/crs/misc/R42432.pdf>.

⁴⁰ *Interior Department Supported \$106 Billion in Recreation, Conservation, Water and Renewable Energy Investments, Supporting More than 860,000 Jobs in FY 2015*, U.S. Dep't of the Interior (June 17, 2016), <https://www.doi.gov/pressreleases/interior-department-supported-106-billion-recreation-conservation-water-and-renewable>.

REQUEST FOR ADMISSION NO. 33:

From Fiscal Year 1988 through Fiscal Year 2016, the DEPARTMENT OF THE INTERIOR issued 1,596,223 oil and gas leases on FEDERAL LANDS.⁴¹

ANSWER:

REQUEST FOR ADMISSION NO. 34:

Under leases administered by the DEPARTMENT OF THE INTERIOR's Bureau of Indian Affairs, in 2014 a total of 968 trillion Btu of crude oil and lease condensate, natural gas plant liquids, natural gas, and coal were produced in INDIAN COUNTRY.⁴²

ANSWER:

⁴¹ *Total Number of Leases in Effect*, U.S. Dep't of the Interior, https://www.blm.gov/sites/blm.gov/files/oilandgas_ogstatistics_t2totalnumberleasesineffect.xlsx (last visited Mar. 6, 2018).

⁴² U.S. Energy Info. Admin., *Sales of Fossil Fuels Produced from Federal and Indian Lands, FY 2003 through FY 2014*, at 3 (2015), <https://www.eia.gov/analysis/requests/federallands/pdf/eia-federallandsales.pdf>.

REQUEST FOR ADMISSION NO. 35:

From 2009-2011, DEPARTMENT OF THE INTERIOR, through the Office of Indian Energy and Economic Development, has assisted mineral owners in INDIAN COUNTRY in the negotiation of 48 leases for oil, gas, renewable energy, and aggregate materials development on approximately 2.8 million acres.⁴³

ANSWER:

REQUEST FOR ADMISSION NO. 36:

DEPARTMENT OF THE INTERIOR, through the Bureau of Ocean Energy Management, administers a federal leasing program that includes providing entities with permission to extract the oil and gas resources of the OUTER CONTINENTAL SHELF.

ANSWER:

REQUEST FOR ADMISSION NO. 37:

Without the prior authorization of the DEPARTMENT OF THE INTERIOR, through the Bureau of Ocean Energy Management, an entity would not be able to develop and extract oil and gas resources of the OUTER CONTINENTAL SHELF.

ANSWER:

⁴³ Dep't of the Interior, *New Energy Frontier*, at DH-40 (2012), https://www.doi.gov/sites/doi.opengov.ibmcloud.com/files/uploads/FY2013_BIB_DH027.pdf.

REQUEST FOR ADMISSION NO. 38:

In calendar year 2010, DEPARTMENT OF THE INTERIOR offered 37 million acres of the OUTER CONTINENTAL SHELF in the Gulf of Mexico for oil and gas exploration and production.⁴⁴

ANSWER:

REQUEST FOR ADMISSION NO. 39:

In 2011, 35 million acres of the OUTER CONTINENTAL SHELF were under oil and gas lease, with 6.2 million acres in production.⁴⁵

ANSWER:

REQUEST FOR ADMISSION NO. 40:

In 2011, DEPARTMENT OF THE INTERIOR, through the Bureau of Safety and Environmental Enforcement, approved 1,381 of the 1,413 requests received from private entities to extend deepwater Gulf and Alaskan offshore leases after the Deepwater Horizon oil spill, or 97.7 percent of such requests.⁴⁶

ANSWER:

⁴⁴ Dep't of the Interior, *New Energy Frontier*, at DH-37 (2012), https://www.doi.gov/sites/doi.opengov.ibmcloud.com/files/uploads/FY2013_BIB_DH027.pdf.

⁴⁵ Dep't of the Interior, *New Energy Frontier*, at DH-30 (2012), https://www.doi.gov/sites/doi.opengov.ibmcloud.com/files/uploads/FY2013_BIB_DH027.pdf.

⁴⁶ Dep't of the Interior, *New Energy Frontier*, at DH-38 (2012), https://www.doi.gov/sites/doi.opengov.ibmcloud.com/files/uploads/FY2013_BIB_DH027.pdf.

REQUEST FOR ADMISSION NO. 41:

As of January 2016, the DEPARTMENT OF THE INTERIOR, through the Bureau of Ocean Energy Management, administered more than 5,000 active oil and gas leases on nearly 27 million OUTER CONTINENTAL SHELF acres.⁴⁷

ANSWER:

REQUEST FOR ADMISSION NO. 42:

In Fiscal Year 2015, the DEPARTMENT OF THE INTERIOR, through the Bureau of Ocean Energy Management, authorized the extraction of more than 550 million barrels of oil, accounting for about 16% of United States' oil production.⁴⁸

ANSWER:

⁴⁷ U.S. Dep't of the Interior, Bureau of Ocean Energy Mgmt., *Statement of Abigail Ross Hopper, Director, Bureau of Ocean Energy Management, U.S. Department of the Interior: Before the House Committee on Natural Resources Subcommittee on Energy and Mineral Resources 3* (2016), <https://www.boem.gov/FY2017-Budget-Testimony-03-01-2016>.

⁴⁸ U.S. Dep't of the Interior, Bureau of Ocean Energy Mgmt., *Statement of Abigail Ross Hopper, Director, Bureau of Ocean Energy Management, U.S. Department of the Interior: Before the House Committee on Natural Resources Subcommittee on Energy and Mineral Resources 3* (2016), <https://www.boem.gov/FY2017-Budget-Testimony-03-01-2016>.

REQUEST FOR ADMISSION NO. 43:

In Fiscal Year 2015, the DEPARTMENT OF THE INTERIOR, through the Bureau of Ocean Energy Management, authorized the extraction of more than 1.35 trillion cubic feet of natural gas, accounting for about 5% of domestic natural gas production.⁴⁹

ANSWER:

REQUEST FOR ADMISSION NO. 44:

During 2015, the DEPARTMENT OF THE INTERIOR, through the Bureau of Ocean Energy Management, issued 194 leases to develop and extract oil and gas resources on the OUTER CONTINENTAL SHELF.⁵⁰

ANSWER:

⁴⁹ U.S. Dep't of the Interior, Bureau of Ocean Energy Mgmt., *Statement of Abigail Ross Hopper, Director, Bureau of Ocean Energy Management, U.S. Department of the Interior: Before the House Committee on Natural Resources Subcommittee on Energy and Mineral Resources 3* (2016), <https://www.boem.gov/FY2017-Budget-Testimony-03-01-2016>.

⁵⁰ U.S. Dep't of the Interior, Bureau of Ocean Energy Mgmt., *Statement of Abigail Ross Hopper, Director, Bureau of Ocean Energy Management, U.S. Department of the Interior: Before the House Committee on Natural Resources Subcommittee on Energy and Mineral Resources 3* (2016), <https://www.boem.gov/FY2017-Budget-Testimony-03-01-2016>.

REQUEST FOR ADMISSION NO. 45:

From 2005–2017, the DEPARTMENT OF THE INTERIOR, through the Bureau of Ocean Energy Management, authorized the production of 6,322,257,723 barrels of oil from the OUTER CONTINENTAL SHELF.⁵¹

ANSWER:

REQUEST FOR ADMISSION NO. 46:

From 2015–2017, the DEPARTMENT OF THE INTERIOR authorized the production of 24,995,060,976 MCF of natural gas from the OUTER CONTINENTAL SHELF.⁵²

ANSWER:

⁵¹ U.S. Dep’t of the Interior, Bureau of Safety & Envtl. Enforcement, Gulf of Mex. Region, *Annual Summary of Production for Entire Region 2005-2018* (2018), <https://www.data.boem.gov/Production/Files/Annual%20Production%202005%20-%20Present.pdf>.

⁵² U.S. Dep’t of the Interior, Bureau of Safety & Envtl. Enforcement, Gulf of Mex. Region, *Annual Summary of Production for Entire Region 2005-2018* (2018), <https://www.data.boem.gov/Production/Files/Annual%20Production%202005%20-%20Present.pdf>.

REQUEST FOR ADMISSION NO. 47:

From 2000–2004, the DEPARTMENT OF THE INTERIOR authorized the production of 2,743,825,357 barrels of oil and 22,952,721,027 MCF of natural gas from the OUTER CONTINENTAL SHELF.⁵³

ANSWER:

REQUEST FOR ADMISSION NO. 48:

From 1995–1999, the DEPARTMENT OF THE INTERIOR authorized the production of 2,064,816,651 barrels of oil and 25,092,411,136 MCF of natural gas from the OUTER CONTINENTAL SHELF.⁵⁴

ANSWER:

⁵³ U.S. Dep’t of the Interior, Minerals Mgmt. Serv., Gulf of Mex. Region, *Annual Summary of Production for Entire Region 2000-2004* (2006), <https://www.data.boem.gov/Production/Files/Annual%20Production%202000%20-%202004.pdf>.

⁵⁴ U.S. Dep’t of the Interior, Minerals Mgmt. Serv., Gulf of Mex. Region, *Annual Summary of Production for Entire Region 1995-1999* (2006), <https://www.data.boem.gov/Production/Files/Annual%20Production%201995%20-%201999.pdf>.

REQUEST FOR ADMISSION NO. 49:

From 1989–1994, the DEPARTMENT OF THE INTERIOR authorized the production of 1,777,177,894 barrels of oil and 28,358,574,313 MCF of natural gas from the OUTER CONTINENTAL SHELF.⁵⁵

ANSWER:

REQUEST FOR ADMISSION NO. 50:

From 1983–1988, the DEPARTMENT OF THE INTERIOR authorized the production of 2,009,490,768 barrels of oil and 25,842,165,144 MCF of natural gas from the OUTER CONTINENTAL SHELF.⁵⁶

ANSWER:

⁵⁵ U.S. Dep’t of the Interior, Minerals Mgmt. Serv., Gulf of Mex. Region, *Annual Summary of Production for Entire Region 1989-1994* (1997), <https://www.data.boem.gov/Production/Files/Region%20Production%20by%20Year%201989-1994.pdf>.

⁵⁶ U.S. Dep’t of the Interior, Minerals Mgmt. Serv., Gulf of Mex. Region, *Annual Summary of Production for Entire Region 1983-1988* (1997), <https://www.data.boem.gov/Production/Files/Region%20Production%20by%20Year%201983-1988.pdf>.

REQUEST FOR ADMISSION NO. 51:

From 1977–1982, the DEPARTMENT OF THE INTERIOR authorized the production of 1,636,886,336 barrels of oil and 26,999,283,161 MCF of natural gas from the OUTER CONTINENTAL SHELF.⁵⁷

ANSWER:

REQUEST FOR ADMISSION NO. 52:

From 1971–1976, the DEPARTMENT OF THE INTERIOR authorized the production of 2,063,615,481 barrels of oil and 19,445,973,940 MCF of natural gas from the OUTER CONTINENTAL SHELF.⁵⁸

ANSWER:

⁵⁷ U.S. Dep’t of the Interior, Minerals Mgmt. Serv., Gulf of Mex. Region, *Annual Summary of Production for Entire Region 1977-1982* (1997), <https://www.data.boem.gov/Production/Files/Region%20Production%20by%20Year%201977-1982.pdf>.

⁵⁸ U.S. Dep’t of the Interior, Minerals Mgmt. Serv., Gulf of Mex. Region, *Annual Summary of Production for Entire Region 1971-1976* (1997), <https://www.data.boem.gov/Production/Files/Region%20Production%20by%20Year%201971-1976.pdf>.

REQUEST FOR ADMISSION NO. 53:

From 1965–1970, the DEPARTMENT OF THE INTERIOR authorized the production of 1,396,213,129 barrels of oil and 8,971,713,029 MCF of natural gas from the OUTER CONTINENTAL SHELF.⁵⁹

ANSWER:

REQUEST FOR ADMISSION NO. 54:

From 1959–1964, the DEPARTMENT OF THE INTERIOR authorized the production of 410,296,529 barrels of oil and 2,496,795,334 MCF of natural gas from the OUTER CONTINENTAL SHELF.⁶⁰

ANSWER:

⁵⁹ U.S. Dep’t of the Interior, Minerals Mgmt. Serv., Gulf of Mex. Region, *Annual Summary of Production for Entire Region 1965-1970* (1997), <https://www.data.boem.gov/Production/Files/Region%20Production%20by%20Year%201965-1970.pdf>.

⁶⁰ U.S. Dep’t of the Interior, Minerals Mgmt. Serv., Gulf of Mex. Region, *Annual Summary of Production for Entire Region 1959-1964* (1997), <https://www.data.boem.gov/Production/Files/Region%20Production%20by%20Year%201959-1964.pdf>.

REQUEST FOR ADMISSION NO. 55:

From 1953–1958, the DEPARTMENT OF THE INTERIOR authorized the production of 46,085,044 barrels of oil and 499,932,002 MCF of natural gas from the OUTER CONTINENTAL SHELF.⁶¹

ANSWER:

REQUEST FOR ADMISSION NO. 56:

From 1947–1952, the DEPARTMENT OF THE INTERIOR authorized the production of 1,656,779 barrels of oil and 21,345,971 MCF of natural gas from the OUTER CONTINENTAL SHELF.⁶²

ANSWER:

⁶¹ U.S. Dep’t of the Interior, Minerals Mgmt. Serv., Gulf of Mex. Region, *Annual Summary of Production for Entire Region 1953-1958* (1997), <https://www.data.boem.gov/Production/Files/Region%20Production%20by%20Year%201953-1958.pdf>.

⁶² U.S. Dep’t of the Interior, Minerals Mgmt. Serv., Gulf of Mex. Region, *Annual Summary of Production for Entire Region 1947-1952* (1997), <https://www.data.boem.gov/Production/Files/Region%20Production%20by%20Year%201947-1952.pdf>.

REQUEST FOR ADMISSION NO. 57:

Under the ROYALTY-IN-KIND PROGRAM, prior to its cancellation in September 2009, entities that extracted oil from the OUTER CONTINENTAL SHELF were required to provide 12.5%–16.7% of the oil they produced to the U.S. Government.⁶³

ANSWER:

REQUEST FOR ADMISSION NO. 58:

On March 28, 2017, President Trump made the following statement at the signing of the Executive Order to Create Energy Independence: “I made them this promise: We will put our miners back to work. We’ve already eliminated a devastating anti-coal regulation — but that was just the beginning.”⁶⁴

ANSWER:

⁶³ *Strategic Petroleum Reserve*, U.S. Dep’t of Energy, Office of Fossil Energy, <https://energy.gov/fe/services/petroleum-reserves/strategic-petroleum-reserve> (last visited Mar. 7, 2018).

⁶⁴ *Remarks by President Trump at Signing Executive Order to Create Energy Independence*, White House (Mar. 28, 2017), <https://www.whitehouse.gov/briefings-statements/remarks-president-trump-signing-executive-order-create-energy-independence/>.

REQUEST FOR ADMISSION NO. 59:

On March 28, 2017, President Trump made the following statement at the signing of the Executive Order to Create Energy Independence: “Today, I’m taking bold action to follow through on that promise. My administration is putting an end to the war on coal.”⁶⁵

ANSWER:

REQUEST FOR ADMISSION NO. 60:

On March 28, 2017, President Trump made the following statement at the signing of the Executive Order to Create Energy Independence: “[W]e are lifting the ban on federal leasing for coal production.”⁶⁶

ANSWER:

⁶⁵ *Remarks by President Trump at Signing Executive Order to Create Energy Independence*, White House (Mar. 28, 2017), <https://www.whitehouse.gov/briefings-statements/remarks-president-trump-signing-executive-order-create-energy-independence/>.

⁶⁶ *Remarks by President Trump at Signing Executive Order to Create Energy Independence*, White House (Mar. 28, 2017), <https://www.whitehouse.gov/briefings-statements/remarks-president-trump-signing-executive-order-create-energy-independence/>.

REQUEST FOR ADMISSION NO. 61:

On March 28, 2017, President Trump made the following statement at the signing of the Executive Order to Create Energy Independence: “[W]e are lifting job-killing restrictions on the production of oil, natural gas, clean coal, and shale energy.”⁶⁷

ANSWER:

REQUEST FOR ADMISSION NO. 62:

On March 28, 2017, President Trump made the following statement at the signing of the Executive Order to Create Energy Independence: “We will unlock job-producing natural gas, oil, and shale energy. We will produce American coal to power American industry. We will transport American energy through American pipelines, made with American steel.”⁶⁸

ANSWER:

⁶⁷ *Remarks by President Trump at Signing Executive Order to Create Energy Independence*, White House (Mar. 28, 2017), <https://www.whitehouse.gov/briefings-statements/remarks-president-trump-signing-executive-order-create-energy-independence/>.

⁶⁸ *Remarks by President Trump at Signing Executive Order to Create Energy Independence*, White House (Mar. 28, 2017), <https://www.whitehouse.gov/briefings-statements/remarks-president-trump-signing-executive-order-create-energy-independence/>.

REQUEST FOR ADMISSION NO. 63:

On April 28, 2017, President Trump made the following statement at the signing of the Executive Order on an America-First Offshore Energy Strategy: “We’re also pleased to welcome many members of Congress and energy industry leaders to the White House. And I want to get them immediately back over there because I know they’re going to be voting on lots of different things, right? So we can’t spend too much time talking about drilling in the Arctic, right? But we’re opening it up.”⁶⁹

ANSWER:

REQUEST FOR ADMISSION NO. 64:

On April 28, 2017, President Trump made the following statement at the signing of the Executive Order on an America-First Offshore Energy Strategy: “This executive order starts the process of opening offshore areas to job-creating energy exploration. It reverses the previous administration’s Arctic leasing ban. So hear that: It reverses the previous administration’s Arctic leasing ban, and directs Secretary Zinke to allow responsible development of offshore areas that will bring revenue to our Treasury and jobs to our workers.”⁷⁰

ANSWER:

⁶⁹ *Remarks by President Trump at Signing of Executive Order on an America-First Offshore Energy Strategy*, White House (Apr. 28, 2017), <https://www.whitehouse.gov/briefings-statements/remarks-president-trump-signing-executive-order-create-energy-independence/>.

⁷⁰ *Remarks by President Trump at Signing of Executive Order on an America-First Offshore Energy Strategy*, White House (Apr. 28, 2017), <https://www.whitehouse.gov/briefings-statements/remarks-president-trump-signing-executive-order-create-energy-independence/>.

REQUEST FOR ADMISSION NO. 65:

BOEM is soliciting comments from the oil and gas industry on their interest in the areas proposed for leasing by BOEM in a 2019 oil and gas lease sale in the Beaufort Sea Planning Area, which might be open to lease after the DEPARTMENT OF INTERIOR completes its five-year offshore oil and gas leasing planning.⁷¹

ANSWER:

REQUEST FOR ADMISSION NO. 66:

In a Presidential Memorandum Regarding Construction of the Keystone XL Pipeline, the President directed the DEPARTMENT OF THE INTERIOR through the Secretary of the Interior, as well as the Directors of the Bureau of Land Management and the United States Fish and Wildlife Service, to “take all steps necessary and appropriate to review and approve as warranted, in an expedited manner, requests for approvals related to the Keystone XL Pipeline, to the maximum extent permitted by law” upon TransCanada accepting President Trump’s invitation to “promptly re-submit its application” for a Presidential permit.⁷²

ANSWER:

⁷¹ *2019 Beaufort Sea OCS Oil and Gas Lease Sale*, BOEM, <https://www.boem.gov/beaufort-call/> (last visited May 3, 2018); *BOEM to Extend Call for Information and Nominations for Proposed 2019 Beaufort Sea Lease Sale* (Apr. 25, 2018), <https://www.boem.gov/press04252018/>.

⁷² *Presidential Memorandum Regarding Construction of the Keystone XL Pipeline*, White House (Jan. 24, 2017), <https://www.whitehouse.gov/presidential-actions/presidential-memorandum-regarding-construction-keystone-xl-pipeline/>.

REQUEST FOR ADMISSION NO. 67:

In a Presidential Memorandum Regarding Construction of the Dakota Access Pipeline, President Trump directed the DEPARTMENT OF THE INTERIOR, through the Secretary of the Interior and relevant agencies, “to expedite reviews and approvals for the remaining portions of the Dakota Access Pipeline, a \$3.8 billion, 1,100-mile pipeline designed to carry around 500,000 barrels per day of crude oil from the Bakken and Three Forks oil production areas in North Dakota to oil markets in the U.S.”⁷³

ANSWER:

REQUEST FOR ADMISSION NO. 68:

The DEPARTMENT OF THE INTERIOR, through the BLM, manages and administers livestock grazing leases on 155 million acres of FEDERAL LANDS.⁷⁴

ANSWER:

⁷³ *President Trump Takes Action to Expedite Priority Energy and Infrastructure Projects*, White House (Jan. 24, 2017), <https://www.whitehouse.gov/briefings-statements/president-trump-takes-action-expedite-priority-energy-infrastructure-projects/>.

⁷⁴ *Livestock Grazing on Public Lands*, U.S. Dep’t of the Interior, Bureau of Land Mgmt., <https://www.blm.gov/programs/natural-resources/rangelands-and-grazing/livestock-grazing> (last visited Mar. 7, 2018).

REQUEST FOR ADMISSION NO. 69:

The DEPARTMENT OF THE INTERIOR, through the BLM, authorizes and administers nearly 18,000 permits and leases held by ranchers who graze their livestock at least part of the year on more than 21,000 allotments on FEDERAL LANDS.⁷⁵

ANSWER:

REQUEST FOR ADMISSION NO. 70:

Without a permit or lease from the DEPARTMENT OF THE INTERIOR or authorization by Federal regulation or statute, no person or private entity may lawfully graze livestock on FEDERAL LANDS.⁷⁶

ANSWER:

⁷⁵ *Livestock Grazing on Public Lands*, U.S. Dep't of the Interior, Bureau of Land Mgmt., <https://www.blm.gov/programs/natural-resources/rangelands-and-grazing/livestock-grazing> (last visited Mar. 7, 2018).

⁷⁶ See 43 U.S.C. § 315 (2012); 43 U.S.C. § 315b (2012) (“The Secretary of the Interior is authorized to issue or cause to be issued permits to graze livestock on such grazing districts to such bona fide settlers, residents, and other stock owners as under his rules and regulations are entitled to participate in the use of the range, upon the payment annually of reasonable fees in each case to be fixed or determined from time to time in accordance with governing law. . . . [T]he creation of a grazing district or the issuance of a permit pursuant to the provisions of this subchapter shall not create any right, title, interest, or estate in or to the lands.”); 43 U.S.C. § 1733(g) (2012) (“The use, occupancy, or development of any portion of the public lands contrary to any regulation of the Secretary or other responsible authority, or contrary to any order issued pursuant to any such regulation, is unlawful and prohibited.”); 43 U.S.C. § 1752 (2012); 43 C.F.R. § 4130.2 (2017); 43 C.F.R. § 4140.1(b) (2017) (“Persons performing the following prohibited acts on BLM-administered lands are subject to civil and criminal penalties set forth at §§ 4170.1 and 4170.2: (1) Allowing livestock or other privately owned or controlled animals to graze on or be driven across these lands: (i) Without permit or lease or other grazing use authorization (see § 4130.6) and timely payment of grazing fees; (ii) In violation of the terms and conditions of a permit, lease, or other grazing use authorization including, but not limited to, livestock in excess of the number authorized; (iii) In an area or at a time different from that authorized; or (iv) Failing to comply with a requirement under § 4130.7(c) of this title.”).

REQUEST FOR ADMISSION NO. 71:

In FY 2015, the DEPARTMENT OF THE INTERIOR, through the BLM, authorized a total of 15,096 permits and/or leases for a total of 7,920,576 AUMs for cattle, yearlings, and bison on FEDERAL LANDS.⁷⁷

ANSWER:

REQUEST FOR ADMISSION NO. 72:

In FY 2014, the DEPARTMENT OF THE INTERIOR, through the BLM, authorized a total of 14,978 permits and/or leases for a total of 7,611,952 AUMs for cattle, yearlings, and bison on FEDERAL LANDS.⁷⁸

ANSWER:

⁷⁷ See U.S. Dep't of the Interior, Bureau of Land Mgmt., *Public Land Statistics 2015*, at 87 (2016),

<https://www.blm.gov/sites/blm.gov/files/documents/files/Public%20Land%20Statistics2015%20%281%29.pdf>

⁷⁸ U.S. Dep't of the Interior, Bureau of Land Mgmt., *Public Land Statistics 2015*, at 84 (2016), <https://www.blm.gov/sites/blm.gov/files/documents/files/Public%20Land%20Statistics2015%20%281%29.pdf>

REQUEST FOR ADMISSION NO. 73:

In FY 2013, the DEPARTMENT OF THE INTERIOR, through the BLM, authorized a total of 15,039 permits and/or leases for a total of 7,735,242 AUMs for cattle, yearlings, and bison on FEDERAL LANDS.⁷⁹

ANSWER:

REQUEST FOR ADMISSION NO. 74:

In FY 2012, the DEPARTMENT OF THE INTERIOR, through the BLM, authorized a total of 15,163 permits and/or leases for a total of 8,054,430 AUMs for cattle, yearlings, and bison on FEDERAL LANDS.⁸⁰

ANSWER:

REQUEST FOR ADMISSION NO. 75:

In FY2011, the DEPARTMENT OF THE INTERIOR, through the BLM, authorized a total of 15,042 permits and/or leases for a total of 8,231,313 AUMs for cattle, yearlings, and bison on FEDERAL LANDS.⁸¹

ANSWER:

⁷⁹ See U.S. Dep't of the Interior, Bureau of Land Mgmt., *Public Land Statistics 2014*, at 85 (2015), https://www.blm.gov/public_land_statistics/pls14/pls2014.pdf.

⁸⁰ See U.S. Dep't of the Interior, Bureau of Land Mgmt., *Public Land Statistics 2013*, at 85 (2014), https://www.blm.gov/public_land_statistics/pls13/pls2013.pdf.

⁸¹ See U.S. Dep't of the Interior, Bureau of Land Mgmt., *Public Land Statistics 2012*, at 85 (2013), https://www.blm.gov/public_land_statistics/pls12/pls2012.pdf.

REQUEST FOR ADMISSION NO. 76:

In FY 2010, the DEPARTMENT OF THE INTERIOR, through the BLM, authorized a total of 14,908 permits and/or leases for a total of 7,928,752 AUMs for cattle, yearlings, and bison on FEDERAL LANDS.⁸²

ANSWER:

REQUEST FOR ADMISSION NO. 77:

In FY 2009, the DEPARTMENT OF THE INTERIOR, through the BLM, authorized a total of 14,775 permits and/or leases for a total of 7,852,112 AUMs for cattle, yearlings, and bison on FEDERAL LANDS.⁸³

ANSWER:

REQUEST FOR ADMISSION NO. 78:

In FY 2008, the DEPARTMENT OF THE INTERIOR, through the BLM, authorized a total of 14,991 permits and/or leases for a total of 7,802,503 AUMs for cattle, yearlings, and bison on FEDERAL LANDS.⁸⁴

ANSWER:

⁸² See U.S. Dep't of the Interior, Bureau of Land Mgmt., *Public Land Statistics 2011*, at 88 (2012), https://www.blm.gov/public_land_statistics/pls11/pls2011.pdf.

⁸³ See U.S. Dep't of the Interior, Bureau of Land Mgmt., *Public Land Statistics 2010*, at 90 (2011), https://www.blm.gov/public_land_statistics/pls10/pls10.pdf.

⁸⁴ See U.S. Dep't of the Interior, Bureau of Land Mgmt., *Public Land Statistics 2009*, at 86 (2010), https://www.blm.gov/public_land_statistics/pls09/pls09.pdf.

REQUEST FOR ADMISSION NO. 79:

In FY 2007, the DEPARTMENT OF THE INTERIOR, through the BLM, authorized a total of 14,793 permits and/or leases for a total of 7,817,588 AUMs for cattle, yearlings, and bison on FEDERAL LANDS.⁸⁵

ANSWER:

REQUEST FOR ADMISSION NO. 80:

In FY 2006, the DEPARTMENT OF THE INTERIOR, through the BLM, authorized a total of 15,067 permits and/or leases for a total of 7,751,500 AUMs for cattle, yearlings, and buffalo on FEDERAL LANDS.⁸⁶

ANSWER:

REQUEST FOR ADMISSION NO. 81:

In FY 2005, the DEPARTMENT OF THE INTERIOR, through the BLM, authorized a total of 14,695 permits and/or leases for a total of 7,120,318 AUMs for cattle, yearlings, and buffalo on FEDERAL LANDS.⁸⁷

ANSWER:

⁸⁵ See U.S. Dep't of the Interior, Bureau of Land Mgmt., *Public Land Statistics 2008*, at 88 (2009), https://www.blm.gov/public_land_statistics/pls08/pls08.pdf.

⁸⁶ See U.S. Dep't of the Interior, Bureau of Land Mgmt., *Public Land Statistics 2007*, at 88 (2008), https://www.blm.gov/public_land_statistics/pls07/pls07.pdf.

⁸⁷ See U.S. Dep't of the Interior, Bureau of Land Mgmt., *Public Land Statistics 2006*, at 88 (2007), https://www.blm.gov/public_land_statistics/pls06/pls06.pdf.

REQUEST FOR ADMISSION NO. 82:

In FY 2004, the DEPARTMENT OF THE INTERIOR, through the BLM, authorized a total of 14,765 permits and/or leases for a total of 6,901,077 AUMs for cattle, yearlings, and buffalo on FEDERAL LANDS.⁸⁸

ANSWER:

REQUEST FOR ADMISSION NO. 83:

In FY 2003, the DEPARTMENT OF THE INTERIOR, through the BLM, authorized a total of 14,702 permits and/or leases for a total of 6,819,250 AUMs for cattle, yearlings, and buffalo on FEDERAL LANDS.⁸⁹

ANSWER:

REQUEST FOR ADMISSION NO. 84:

In FY 2002, the DEPARTMENT OF THE INTERIOR, through the BLM, authorized a total of 15,064 permits and/or leases for a total of 7,520,745 AUMs for cattle, yearlings, and buffalo on FEDERAL LANDS.⁹⁰

ANSWER:

⁸⁸ See U.S. Dep't of the Interior, Bureau of Land Mgmt., *Public Land Statistics 2005*, at 88 (2005), https://www.blm.gov/public_land_statistics/pls05/pls05.pdf.

⁸⁹ See U.S. Dep't of the Interior, Bureau of Land Mgmt., *Public Land Statistics 2004*, at 84 (2005), https://www.blm.gov/public_land_statistics/pls04/pls04.pdf.

⁹⁰ See U.S. Dep't of the Interior, Bureau of Land Mgmt., *Public Land Statistics 2003*, at 89, Table 3-7c (2004), https://www.blm.gov/public_land_statistics/pls03/pls03.pdf.

REQUEST FOR ADMISSION NO. 85:

In FY 2001, the DEPARTMENT OF THE INTERIOR, through the BLM, authorized a total of 15,222 permits and/or leases for a total of 8,084,262 AUMs for cattle, yearlings, and buffalo on FEDERAL LANDS.⁹¹

ANSWER:

REQUEST FOR ADMISSION NO: 86:

In FY 2000, the DEPARTMENT OF THE INTERIOR, through the BLM, authorized a total of 15,741 permits and/or leases for a total of 8,546,234 AUMs for cattle, yearlings, and buffalo on FEDERAL LANDS.⁹²

ANSWER:

⁹¹ See U.S. Dep't of the Interior, Bureau of Land Mgmt., *Public Land Statistics 2002*, at 91, Table 3-7c (2003), https://www.blm.gov/public_land_statistics/pls02/pls02.pdf.

⁹² See U.S. Dep't of the Interior, Bureau of Land Mgmt., *Public Land Statistics 2001*, at 85, Table 3-7c (2002), https://www.blm.gov/public_land_statistics/pls01/pls01.pdf.

REQUEST FOR ADMISSION NO. 87:

In FY 1999, the DEPARTMENT OF THE INTERIOR, through the BLM, authorized 9,913 permits and/or leases for a total of 9,065,456 AUMs for cattle, yearlings, and buffalo on FEDERAL LANDS.⁹³

ANSWER:

REQUEST FOR ADMISSION NO. 88:

In FY 1998, the DEPARTMENT OF THE INTERIOR, through the BLM, authorized 10,073 permits and/or leases for a total of 9,283,279 AUMs for cattle, yearlings, and buffalo on FEDERAL LANDS.⁹⁴

ANSWER:

⁹³ See U.S. Dep't of the Interior, Bureau of Land Mgmt., *Public Land Statistics 1999* (2000), https://www.blm.gov/public_land_statistics/pls99/index.html (follow links to "3-7: Summary of Authorized Use of Grazing District Lands (Section 3)" and "3-8: Summary of Authorized Use of Grazing Lease Lands (Section 15)").

⁹⁴ See U.S. Dep't of the Interior, Bureau of Land Mgmt., *Public Land Statistics 1998* (1999), https://www.blm.gov/public_land_statistics/pls98/index.html (follow links to "3-7: Summary of Authorized Use of Grazing District (Section 3) Lands" and "3-8: Summary of Authorized Use of Grazing Lease (Section 15) Lands").

REQUEST FOR ADMISSION NO. 89:

In FY 1997, the DEPARTMENT OF THE INTERIOR, through the BLM, authorized 9,732 permits and/or leases for a total of 8,406,483 AUMs for cattle, yearlings, and buffalo on FEDERAL LANDS.⁹⁵

ANSWER:

REQUEST FOR ADMISSION NO. 90:

In FY 1996 the DEPARTMENT OF THE INTERIOR, through the BLM, authorized 9,732 permits and/or leases for a total of 8,694,816 AUMs for cattle, yearlings, and buffalo on FEDERAL LANDS.⁹⁶

ANSWER:

⁹⁵ See U.S. Dep't of the Interior, Bureau of Land Mgmt., *Public Land Statistics 1997* (1998), https://www.blm.gov/public_land_statistics/pls97/index.html (follow links to "3-5: Summary of Authorized Use of Grazing District (Section 3) Lands" and "3-6: Summary of Authorized Use of Grazing Lease (Section 15) Lands").

⁹⁶ See U.S. Dep't of the Interior, Bureau of Land Mgmt., *Public Land Statistics 1996* (1996), <https://www.gpo.gov/fdsys/pkg/GPO-DOI-BLM-PUBLAND-1996/content-detail.html> (follow links to "3-5: Summary of Authorized Use of Grazing District (Section 3) Lands" and "3-6: Summary of Authorized Use of Grazing Lease (Section 15) Lands").

REQUEST FOR ADMISSION NO. 91:

A person or other entity cannot HARVEST timber from FEDERAL LANDS managed by the DEPARTMENT OF THE INTERIOR without prior authorization from the DEPARTMENT OF THE INTERIOR.

ANSWER:

REQUEST FOR ADMISSION NO. 92:

In Fiscal Year 2015, over half a billion board feet of timber were HARVESTED from FEDERAL LANDS and INDIAN COUNTRY after receiving prior authorization from the DEPARTMENT OF THE INTERIOR.⁹⁷

ANSWER:

REQUEST FOR ADMISSION NO. 93:

The DEPARTMENT OF THE INTERIOR, through the BLM, develops annual plans for the sale of timber from FEDERAL LANDS.⁹⁸

ANSWER:

⁹⁷ *Interior Department Supported \$106 Billion in Recreation, Conservation, Water and Renewable Energy Investments, Supporting More than 860,000 Jobs in FY 2015*, U.S. Dep't of the Interior (June 17, 2016), <https://www.doi.gov/pressreleases/interior-department-supported-106-billion-recreation-conservation-water-and-renewable>.

⁹⁸ 43 C.F.R. § 5410.0-6 (2017).

REQUEST FOR ADMISSION NO. 94:

An person or other entity cannot extract oil and gas on NATIONAL WILDLIFE REFUGE SYSTEM LANDS without prior authorization from the DEPARTMENT OF THE INTERIOR, through the U.S. Fish and Wildlife Service.

ANSWER:

REQUEST FOR ADMISSION NO. 95:

As of 2000, approximately 14% of the NATIONAL WILDLIFE REFUGE SYSTEM LANDS, in 22 different states, have or have had oil or gas production on the land.⁹⁹

ANSWER:

REQUEST FOR ADMISSION NO. 96:

In calendar year 2000, oil or gas was produced on about 8% of NATIONAL WILDLIFE REFUGE SYSTEM LANDS.¹⁰⁰

ANSWER:

⁹⁹ U.S. Gov't Accountability Off., GAO-02-64R, *Wildlife Refuge Oil and Gas Activity 1* (2001), <http://www.gao.gov/new.items/d0264r.pdf>.

¹⁰⁰ U.S. Gov't Accountability Off., GAO-02-64R, *Wildlife Refuge Oil and Gas Activity 3* (2001), <http://www.gao.gov/new.items/d0264r.pdf>.

REQUEST FOR ADMISSION NO. 97:

As of November 2016, there were over 5,000 oil and gas wells on NATIONAL WILDLIFE REFUGE SYSTEM LANDS, of which about 1,700 are active.¹⁰¹

ANSWER:

REQUEST FOR ADMISSION NO. 98:

Admit that as of November 2016, 257 wells on NATIONAL WILDLIFE REFUGE SYSTEM LANDS produced primarily oil and 8 wells produced a combination of oil and gas.¹⁰²

ANSWER:

REQUEST FOR ADMISSION NO. 99:

Between 2009 and 2015, oil and gas producers on FEDERAL LANDS vented, FLARED, and LEAKED approximately 462 BCF of natural gas.¹⁰³

ANSWER:

¹⁰¹ U.S. Fish & Wildlife Serv., *Non-Federal Oil and Gas Activities on National Wildlife Refuge System Lands* (2016), <https://www.fws.gov/refuges/oil-and-gas/pdfs/Oil-Gas-Fact-sheet.pdf>.

¹⁰² U.S. Fish & Wildlife Serv., *Non-Federal Oil and Gas Activities on National Wildlife Refuge System Lands* (2016), <https://www.fws.gov/refuges/oil-and-gas/pdfs/Oil-Gas-Fact-sheet.pdf>.

¹⁰³ U.S. Dep't of the Interior, *Fact Sheet on Methane and Waste Prevention Rule 1* (2016), https://www.doi.gov/sites/doi.gov/files/uploads/methane_waste_prevention_rule_factsheet.pdf.

REQUEST FOR ADMISSION NO. 100:

In 2014, 81 BCF of natural gas was FLARED and 30 BCF of natural gas was vented from producing operations on FEDERAL LANDS.¹⁰⁴

ANSWER:

REQUEST FOR ADMISSION NO. 101:

In 2008, 28 BCF of natural gas was FLARED from a variety of sources from production operations authorized by onshore leases on FEDERAL LANDS.¹⁰⁵

ANSWER:

REQUEST FOR ADMISSION NO. 102:

In 2008, 16 BCF of natural gas was vented from pneumatic devices from production operations authorized by onshore leases on FEDERAL LANDS.¹⁰⁶

ANSWER:

¹⁰⁴ U.S. Dep't of the Interior, Bureau of Land Mgmt., *Regulatory Impact Analysis for 43 CFR 3179*, at 16 (2016), <https://www.regulations.gov/contentStreamer?documentId=BLM-2016-0001-9127&contentType=pdf>.

¹⁰⁵ U.S. Dep't of the Interior, Bureau of Land Mgmt., *Regulatory Impact Analysis for 43 CFR 3179*, at 15 (2016), <https://www.regulations.gov/contentStreamer?documentId=BLM-2016-0001-9127&contentType=pdf> (citing U.S. Gov't Accountability Off., GAO-11-34, *Federal Oil and Gas Leases: Opportunities Exist to Capture Vented and Flared Natural Gas* (2010), <https://www.gao.gov/new.items/d1134.pdf>).

¹⁰⁶ U.S. Dep't of the Interior, Bureau of Land Mgmt., *Regulatory Impact Analysis for 43 CFR 3179*, at 15 (2016), <https://www.regulations.gov/contentStreamer?documentId=BLM-2016-0001-9127&contentType=pdf> (citing U.S. Gov't Accountability Off., GAO-11-34, *Federal Oil and Gas Leases: Opportunities Exist to Capture Vented and Flared Natural Gas* (2010), <https://www.gao.gov/new.items/d1134.pdf>).

REQUEST FOR ADMISSION NO. 103:

In 2008, 17 BCF of natural gas was vented from gas well liquids unloading from producing operations authorized by onshore leases on FEDERAL LANDS.¹⁰⁷

ANSWER:

REQUEST FOR ADMISSION NO. 104:

In 2008, 30 BCF of natural gas was vented from well completions authorized by onshore oil and gas leases on FEDERAL LANDS.¹⁰⁸

ANSWER:

¹⁰⁷ U.S. Dep't of the Interior, Bureau of Land Mgmt., *Regulatory Impact Analysis for 43 CFR 3179*, at 15 (2016), <https://www.regulations.gov/contentStreamer?documentId=BLM-2016-0001-9127&contentType=pdf> (citing U.S. Gov't Accountability Off., GAO-11-34, *Federal Oil and Gas Leases: Opportunities Exist to Capture Vented and Flared Natural Gas* (2010), <https://www.gao.gov/new.items/d1134.pdf>).

¹⁰⁸ U.S. Dep't of the Interior, Bureau of Land Mgmt., *Regulatory Impact Analysis for 43 CFR 3179*, at 15 (2016), <https://www.regulations.gov/contentStreamer?documentId=BLM-2016-0001-9127&contentType=pdf> (citing U.S. Gov't Accountability Off., GAO-11-34, *Federal Oil and Gas Leases: Opportunities Exist to Capture Vented and Flared Natural Gas* (2010), <https://www.gao.gov/new.items/d1134.pdf>).

REQUEST FOR ADMISSION NO. 105:

In 2008, 18 BCF of natural gas was vented from oil and condensate tanks authorized by onshore oil and gas leases on FEDERAL LANDS.¹⁰⁹

ANSWER:

REQUEST FOR ADMISSION NO. 106:

In 2008, 7 BCF of natural gas was vented from Glycol dehydrators authorized by onshore oil and gas leases on FEDERAL LANDS.¹¹⁰

ANSWER:

¹⁰⁹ U.S. Dep't of the Interior, Bureau of Land Mgmt., *Regulatory Impact Analysis for 43 CFR 3179*, at 15 (2016), <https://www.regulations.gov/contentStreamer?documentId=BLM-2016-0001-9127&contentType=pdf> (citing U.S. Gov't Accountability Off., GAO-11-34, *Federal Oil and Gas Leases: Opportunities Exist to Capture Vented and Flared Natural Gas* (2010), <https://www.gao.gov/new.items/d1134.pdf>).

¹¹⁰ U.S. Dep't of the Interior, Bureau of Land Mgmt., *Regulatory Impact Analysis for 43 CFR 3179*, at 15 (2016), <https://www.regulations.gov/contentStreamer?documentId=BLM-2016-0001-9127&contentType=pdf> (citing U.S. Gov't Accountability Off., GAO-11-34, *Federal Oil and Gas Leases: Opportunities Exist to Capture Vented and Flared Natural Gas* (2010), <https://www.gao.gov/new.items/d1134.pdf>).

REQUEST FOR ADMISSION NO. 107:

In 2008, 10 BCF of natural gas was vented from other sources authorized by onshore oil and gas leases on FEDERAL LANDS.¹¹¹

ANSWER:

REQUEST FOR ADMISSION NO. 108:

In 2014, 80.9 BCF of methane was FLARED from leases to produce oil and gas from FEDERAL LANDS that were issued by the DEPARTMENT OF THE INTERIOR.¹¹²

ANSWER:

¹¹¹ U.S. Dep't of the Interior, Bureau of Land Mgmt., *Regulatory Impact Analysis for 43 CFR 3179*, at 15 (2016), <https://www.regulations.gov/contentStreamer?documentId=BLM-2016-0001-9127&contentType=pdf> (citing U.S. Gov't Accountability Off., GAO-11-34, *Federal Oil and Gas Leases: Opportunities Exist to Capture Vented and Flared Natural Gas* (2010), <https://www.gao.gov/new.items/d1134.pdf>).

¹¹² U.S. Dep't of the Interior, Bureau of Land Mgmt., *Regulatory Impact Analysis for 43 CFR 3179*, at 3 (2016), <https://www.regulations.gov/contentStreamer?documentId=BLM-2016-0001-9127&contentType=pdf> (citing U.S. Gov't Accountability Off., GAO-11-34, *Federal Oil and Gas Leases: Opportunities Exist to Capture Vented and Flared Natural Gas* (2010), <https://www.gao.gov/new.items/d1134.pdf>).

REQUEST FOR ADMISSION NO. 109:

In 2014, 30.15 BCF of methane was vented from leases issued by the DEPARTMENT OF THE INTERIOR for oil and gas production on FEDERAL LANDS.¹¹³

ANSWER:

REQUEST FOR ADMISSION NO. 110:

The DEPARTMENT OF THE INTERIOR has considered that a fixed, global carbon budget may require purposefully limiting U.S. Oil production.¹¹⁴

ANSWER:

REQUEST FOR ADMISSION NO. 111:

Until 2010, there was not a single commercial solar energy project on or under development on FEDERAL LANDS.¹¹⁵

ANSWER:

¹¹³ U.S. Dep't of the Interior, Bureau of Land Mgmt., *Regulatory Impact Analysis for 43 CFR 3179*, at 4 (2016), <https://www.regulations.gov/contentStreamer?documentId=BLM-2016-0001-9127&contentType=pdf> (citing U.S. Gov't Accountability Off., GAO-11-34, *Federal Oil and Gas Leases: Opportunities Exist to Capture Vented and Flared Natural Gas* (2010), <https://www.gao.gov/new.items/d1134.pdf>).

¹¹⁴ E. Wolvovsky & W. Anderson, U.S. Dep't of the Interior, Bureau of Ocean Energy Mgmt., BOEM 2016-065, *OCS Oil and Natural Gas: Potential Lifecycle Greenhouse Gas Emissions and Social Cost of Carbon* 36 (2016), <https://www.boem.gov/OCS-Report-BOEM-2016-065/>.

¹¹⁵ Dep't of the Interior, *New Energy Frontier*, at DH-30 (2012), https://www.doi.gov/sites/doi.opengov.ibmcloud.com/files/uploads/FY2013_BIB_DH027.pdf.

REQUEST FOR ADMISSION NO. 112:

As of 2011, there were no offshore wind or marine hydrokinetic energy project on the OUTER CONTINENTAL SHELF.¹¹⁶

ANSWER:

REQUEST FOR ADMISSION NO. 113:

The DEPARTMENT OF INTERIOR, through the Bureau of Land Management, has identified 20.6 million acres of public land with wind energy potential in 11 western states.¹¹⁷

ANSWER:

REQUEST FOR ADMISSION NO. 114:

The DEPARTMENT OF INTERIOR, through the Bureau of Land Management, has identified 20 million acres with solar energy potential in six southwestern states.¹¹⁸

ANSWER:

¹¹⁶ Dep't of the Interior, *New Energy Frontier*, at DH-30 (2012), https://www.doi.gov/sites/doi.opengov.ibmcloud.com/files/uploads/FY2013_BIB_DH027.pdf.

¹¹⁷ Dep't of the Interior, *New Energy Frontier*, at DH-32 (2012), https://www.doi.gov/sites/doi.opengov.ibmcloud.com/files/uploads/FY2013_BIB_DH027.pdf.

¹¹⁸ Dep't of the Interior, *New Energy Frontier*, at DH-32 (2012), https://www.doi.gov/sites/doi.opengov.ibmcloud.com/files/uploads/FY2013_BIB_DH027.pdf.

REQUEST FOR ADMISSION NO. 115:

The DEPARTMENT OF INTERIOR, through the Bureau of Land Management, has identified 111 million acres of FEDERAL LANDS in western states and in Alaska as open for geothermal leasing.¹¹⁹

ANSWER:

REQUEST FOR ADMISSION NO. 116:

Between 2010-September 12, 2016, DEPARTMENT OF THE INTERIOR, through the Bureau of Land Management, has approved 34 utility-scale solar energy projects with a total approved capacity of 9,763 megawatts of renewable energy.¹²⁰

ANSWER:

REQUEST FOR ADMISSION NO. 117:

As of 2016, the DEPARTMENT OF THE INTERIOR, through the Bureau of Land Management, has authorized 40 wind energy development projects, with a total approved capacity of 5,608 megawatts.¹²¹

ANSWER:

¹¹⁹ Dep't of the Interior, *New Energy Frontier*, at DH-32 (2012),

https://www.doi.gov/sites/doi.opengov.ibmcloud.com/files/uploads/FY2013_BIB_DH027.pdf.

¹²⁰ *Powering Up Renewable Energy on Public Lands*, U.S. Dep't of the Interior (Sept. 12, 2016), <https://www.doi.gov/blog/powering-renewable-energy-public-lands>.

¹²¹ Dep't of the Interior, Bureau of Land Mgmt., *Wind Energy Fact Sheet* (2018), https://www.blm.gov/sites/blm.gov/files/energy_renewablewindfactsheet.pdf.

REQUEST FOR ADMISSION NO. 118:

As of 2016, there are about 39 solar energy projects covering more than 200,000 acres on FEDERAL LANDS primarily in Arizona, California, and Nevada.¹²²

ANSWER:

REQUEST FOR ADMISSION NO. 119:

As of September 12, 2016, DEPARTMENT OF THE INTERIOR, through the Bureau of Land Management, approved 818 geothermal leases across 11 western states and Alaska, for a capacity of 1,500 megawatts of geothermal energy.¹²³

ANSWER:

REQUEST FOR ADMISSION NO. 120:

As of 2008, the DEPARTMENT OF THE INTERIOR, through the U.S. Geological Survey, has been studying the potential of GAS HYDRATES as an energy resource.¹²⁴

ANSWER:

¹²² Dep't of the Interior, Bureau of Land Mgmt., *Solar Energy Fact Sheet* (2018), https://www.blm.gov/sites/blm.gov/files/energy_renewablesolarfactsheet.pdf.

¹²³ *Powering Up Renewable Energy on Public Lands*, U.S. Dep't of the Interior (Sept. 12, 2016), <https://www.doi.gov/blog/powering-renewable-energy-public-lands>.

¹²⁴ USGS, *The U.S. Geological Survey's Gas Hydrates Project* (2018), <https://pubs.usgs.gov/fs/2017/3079/fs20173079.pdf>.

REQUEST FOR ADMISSION NO. 121:

In 2008, the DEPARTMENT OF THE INTERIOR, through the U.S. Geological Survey, completed the first-ever assessment of methane that is recoverable from GAS HYDRATES using existing technology.¹²⁵

ANSWER:

REQUEST FOR ADMISSION NO. 122:

In 2008 the DEPARTMENT OF THE INTERIOR U.S. Geological Survey conducted an assessment and found an estimated 85.4 trillion cubic feet of undiscovered, technically recoverable gas from natural GAS HYDRATES on the Alaskan North Slope.¹²⁶

ANSWER:

¹²⁵ USGS, *The U.S. Geological Survey's Gas Hydrates Project* (2018), <https://pubs.usgs.gov/fs/2017/3079/fs20173079.pdf>.

¹²⁶ Jessica Robertson, *Gas Hydrates on Alaska's North Slope*, USGS (Nov. 11, 2008), <https://www.usgs.gov/media/audio/gas-hydrates-alaskas-north-slope>.

REQUEST FOR ADMISSION NO. 123:

In 2008, the DEPARTMENT OF THE INTERIOR, through the U.S. Geological Survey, has investigated and determined that, of the estimated gas within hydrates on the North Slope of Alaska, 56 percent occurs on federally managed lands, 39 percent on lands and offshore waters managed by the State of Alaska, and 4 percent on Native Alaskan lands.¹²⁷

ANSWER:

REQUEST FOR ADMISSION NO. 124:

The DEPARTMENT OF THE INTERIOR, through the U.S. Geological Survey and the Bureau of Ocean Energy Management, has estimated there are 17.6 billion barrels of technically recoverable oil and more than 50 trillion cubic feet of technically recoverable natural gas in the National Petroleum Reserve in Alaska (NPR-A), the Western Beaufort Sea, adjacent State and Native lands, and State waters.¹²⁸

ANSWER:

¹²⁷ *News Release: Gas Hydrates on Alaska's North Slope Hold One of Nation's Largest Deposits of Technically Recoverable Natural Gas*, U.S. Dep't of the Interior (Nov. 12, 2008), https://www.doi.gov/sites/doi.gov/files/archive/news/archive/08_News_Releases/111208.html.

¹²⁸ *New Interior Department Survey Shows Significant Increase in Recoverable Energy Resources in Federal, State and Tribal Lands and Waters in Alaska*, USGS (Dec. 22, 2017), <https://www.usgs.gov/news/new-interior-department-survey-shows-significant-increase-recoverable-energy-resources-federal>.

REQUEST FOR ADMISSION NO. 125:

The DEPARTMENT OF THE INTERIOR uses economic discounting analyses to inform the DEPARTMENT OF THE INTERIOR's decisions on whether or not to authorize, lease, permit, or otherwise allow for coal, oil, and gas development, mining, and production on onshore or offshore federal public lands.

ANSWER:

Dated: May 4, 2018

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CERTIFICATE OF SERVICE

I hereby certify that on this 4th day of May, 2018, I have served the foregoing Plaintiffs' Requests for Admissions to Defendant the United States Department of the Interior, to Defendant Department of the Interior by email on the following counsel for all parties.

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