



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

REGION 6  
1445 ROSS AVENUE, SUITE 1200  
DALLAS, TX 75202-2733

February 18, 2011

Jonna Polk  
Bureau of Indian Affairs  
Eastern Oklahoma Regional Office  
PO Box 8002  
Muskogee, OK 74402-8002

**SUBJECT: Environmental Assessment (EA) for Oil and Gas Leasing Program within the Osage Nation Mineral Reserve (Reserve), Osage County, Oklahoma**

Dear Ms. Polk:

The Environmental Protection Agency (EPA) Region 6 has received your correspondence, dated January 24, 2011, regarding the scoping request. In accordance with the National Environmental Policy Act, and under Section 309 of the Clean Air Act, our agency is providing the following comments to assist you with the preparation of the EA.

Because of the expansive nature of the proposed project area, EPA recommends the EA analyze impacts to biodiversity and the cumulative impacts of oil and gas exploration and drilling activities on the Reserve. The document "Background for NEPA Reviewers: Crude Oil and Natural Gas Exploration, Development, and Production" should be reviewed while developing the EA. This document can be found here: <http://www.epa.gov/compliance/resources/policies/nepa/oil-and-gas-background-pg.pdf>.

A review of our databases showed several items that should be analyzed for direct, indirect, and cumulative effects:

- air quality;
- historic properties and archeological sites;
- watersheds, including water quality and floodplains;
- biodiversity, including habitat fragmentation; and
- low-income and/or minority populations.

We appreciate the opportunity to participate in the scoping process. Thank you for your coordination and don't hesitate to contact John MacFarlane, of my staff, at 214-665-7491 or [macfarlane.john@epa.gov](mailto:macfarlane.john@epa.gov) should you have any questions or concerns regarding this letter.

Sincerely,

A handwritten signature in black ink, appearing to read "Rhonda Smith".

Rhonda Smith  
Chief, Office of Planning and  
Coordination