SVP
SOCIETY OF VERTEBRATE PALEONTOLOGY
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Society of Vertebrate Paleontology

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Bureau of Land Management
U.S. Department of the Interior
1849 C St. NW, Room 5646
Washington, DC 20240

Subject: Comments on "BLM Utah 2026 Second Quarter Competitive Oil and Gas Lease Sale Environmental Assessment"

To The U.S. Bureau of Land Management,

We represent the Society of Vertebrate Paleontology (**SVP**; http://www.vertpaleo.org), a non-profit international scientific organization—comprised of about 2,000 researchers, educators, students, and enthusiasts—to advance the science of vertebrate paleontology and to support and encourage the discovery, preservation, and protection of vertebrate fossils, fossil sites, and their geological and paleontological contexts. This letter provides our feedback about BLM's newly proposed oil and gas lease sale in Utah (NEPA Number: DOI-BLM-UT-0000-2026-0003-EA). Specifically, we request that the following specific area be removed from the lease sale list due to its scientific significance: i.e., Sec. 18, T22S, R17E, Salt Lake, Grand County, Utah, managed by the BLM Moab Field Office. Hereafter, we refer to the site simply as "Section 18", where it is listed under "UT-2026-06-1751" on the following preliminary parcel list: https://eplanning.blm.gov/public_projects/2041805/200672743/20148896/251048876/UT%202026%20Q2%20Preliminary%20Parcel%20List_update%2020251216.pdf. On the following BLM's map, Section 18 is located within "Lot 7851": https://eplanning.blm.gov/public_projects/2041805/200672744/20148375/251048355/2026%20Q2_Map1of4.pdf.

Section 18 is an exceptionally critical paleontological area, with at least 20 known significant fossil sites. Collectively, the sites in this parcel have produced dozens of dinosaur skeletons in addition to other important plant and animal fossils. Among them are holotype specimens of four different dinosaur species unique to this one area of Utah (i.e., found nowhere else on Earth), including *Falcarius utahensis* (https://doi.org/10.1038/nature03468), *Geminiraptor suarezarum* (https://doi.org/10.1371/journal.pone.0036790), *Iguanacolossus fortis* (https://doi.org/10.1371/journal.pone.0014075), and *Martharaptor greenriverensis* (https://doi.org/10.1371/journal.pone.0043911) from the Lower Cretaceous Cedar Mountain Formation, as well as the holotype fossil of the nesting insect *Eopolis ekdalei* (https://doi.org/10.31711/giw.v7.pp281-299) from the Upper Jurassic Morrison Formation (holotype = a single, formally described, name-bearing reference specimen defining that specific species). These globally significant fossils are the result of the Utah Geological Survey's long-term survey of the paleontological resources in the area over many years. The effort led to the discovery and

description of these scientifically exquisite paleontological resources, which are now preserved in the public trust at the Natural History Museum of Utah. The significance of the dinosaurs in the area, particularly those from the Cedar Mountain Formation, can be found in the following recent paper, among many other publications in the literature:

Kirkland, J.I., Sertich, J.J.W., and Titus, A.L. 2024. Dinosaur biostratigraphy of the nonmarine Cretaceous of Utah. Geological Society of London Special Publication 545: 65–90. https://doi.org/10.1144/SP545-2023-211

We must also emphasize that multiple research institutions and organizations, including many SVP members, have ongoing studies on fossils from Section 18, including fieldwork in the area. In fact, using BLM's Potential Fossil Yield Classification (PFYC) standard, Section 18 is a "5 out of 5"—the highest possible PFYC rating signifying "*highly fossiliferous geologic units that consistently and predictably produce significant paleontological resources*" (https://www.blm.gov/sites/default/files/uploads/IM2016-124_att1.pdf). Its exceptionally high potential to produce more scientifically significant fossil sites and specimens indicates that Section 18 must be preserved and protected for future scientific research and education for the people of the United States.

Our comments are rooted in BLM's mandate to protect and preserve scientifically important paleontological resources as set forth by the U.S. Paleontological Resources Preservation Act (Public Law 111-11, Subtitle D: 16 USC 470aaa) and resulting federal regulations (43 CFR Part 49 § 49.30). We cannot stress hard enough the importance of preserving and protecting paleontological resources in Section 18, where it must not be sold for oil and gas leases. Because Section 18 represents a fraction of the total land under consideration for oil and gas lease sale, we very much appreciate your serious consideration of our request. Questions concerning our letter can be addressed to any one of us, or to SVP's Government Affairs Committee (c/o Dr. Kenshu Shimada) at svp@vertpaleo.org. We look forward to continuing our partnership with BLM to better manage paleontological resources on public lands. Thank you.

Yours sincerely,

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