

Enefit ROW DEIS Talking Points/Issue Summary
(prepared by Anne Mariah Tapp May 3, 2016)

Who is Enefit?

Enefit American Oil is an Estonian company that holds leases for oil shale development to over 30,000 acres of federal, state, and private land in eastern Utah. Enefit's leases are on the Utah/Colorado border and the White River cuts through the lease areas. Enefit American oil is a subsidiary of Eesti Energy.¹ Eesti Energy is 100% owned by the Estonian government.²

What does Enefit want?

Enefit wants to start the first commercial-scale oil shale development project in the United States. To build and run its 50,000 barrel per day facility and strip mine over 13,000 acres in the Colorado River Basin, it needs access for a right of way across federal public land. This Right of Way would provide access to development on Enefit's "South Property."

Why Are You Telling Me This Now?

The BLM determined that an EIS is needed for the ROW, and that development of Enefit South property falls within the scope of the EIS. The DEIS is open for public comment until June 14, 2016, and public meetings about the ROW application are occurring May 3-5.

Why Should I Care?

High Carbon- Enefit has stated that its life cycle GHG emissions for the oil derived from its oil shale are approximately 128.8 gCO₂/MJ (as compared to 93.3 gCO₂e/MJ petroleum baseline for conventional oil).³ In the midst of a United States commitment to lower carbon emissions in recognition of the climate crisis, BLM must reject this proposal and use of federal public lands.

Air Quality - Air quality in the Uinta Basin and Salt Lake City region is among the worst in the nation. Enefit's project will add to emissions, including ground level ozone in the Uinta Basin. Additionally, oil produced at Enefit's project will be shipped to refineries in Salt Lake, adding to air quality issues in the Salt Lake area.

Faulty Analysis – BLM is refusing to analyze any impacts of oil shale development on the South Property in its draft environmental impact statement because Enefit has not provided a development plan. As a result, BLM is unable to assess impacts to air, water, the climate, and endangered species resulting from the South Project due to the lack of Enefit's development plan. At minimum, BLM should delay its decision on the ROW until it is able to meaningfully analyze the cumulative impacts of the South Project – the entire reason the ROW is being constructed on federal public land.

¹ <https://www.enefit.com/en/news/-/news/2016/03/23/eesti-energia-earned-a-net-profit-of-eur-40-million-last-year>, <https://www.enefit.com/news-and-blog/-/news/media-coverage/2014/01/07/estonia-is-cleansing-oil-shale> ("Eesti Energia's subsidiary Enefit is developing two parallel oil shale projects in Jordan")

² <https://www.energia.ee/en/eesti-energiast>

³ http://www.costar-mines.org/oss/31/F-pres-sm-sec/12-4_Aarna_Indrek.pdf

Endangered Species - Federally listed and candidate species occurring within the action area include but are not limited to greater sage-grouse, Mexican spotted owl, Yellow-billed Cuckoo, Bonytail chub, Colorado pikeminnow, Greenback cutthroat trout, humpback chub, razorback sucker, blackfooted ferret, Canada lynx, North American wolverine, clay reed-mustard, Graham beardtongue, parietal cactus, shrubby reed-mustard, barneby reed mustard, Uintah Basin hookless cactus, Ute ladies'-tresses, & White River beardtongue. BLM has not adequately analyzed impacts to these species in the DEIS.

Water Resources: Enefit has not finally clarified either the source or quantity of water it will use to serve its project. The DEIS, at different times, indicates that Enefit may use the Green River, may supplement its water right with additional water from the Green River or the White River, and may use groundwater. This position is unacceptable for the purposes of the EIS. The company must clearly identify all impacts to all water resources in the entirety of its operational area, and those impacts must be accounted for in the EIS. Unless and until the company can provide such information, the EIS cannot be completed.

What Can I Do?

Attend Public Meetings:

- Tuesday, May 3, 2016: Uintah County Library in Vernal (Uintah County Library, 204 East 100 North, Vernal, UT 84078)
- Wednesday, May 4, 2016: Western Rio Blanco Recreation and Park District (611 S. Stanolind Ave. Rangely, CO 81648)
- Thursday, May 5, 2016: Hilton Garden Inn (4975 Wiley Post Way Salt Lake City, UT 84116)

Submit Comments To BLM

- E-mail: UT_Vernal_Comments@blm.gov
- Fax: (435) 781-4410
- Mail: Bureau of Land Management, 170 South 500 East, Vernal, Utah 84078