

From: Vincent Devito
To: [Samantha McDonald](#)
Subject: Re: American Burying Beetle
Date: Thursday, August 03, 2017 3:00:38 PM

Thank you. I look forward to reviewing.

On Aug 3, 2017, at 12:31 PM, Samantha McDonald <SMcDonald@ipaa.org> wrote:

Vince,

Thank for your call this morning. [Here](#) is the link to our original delist petition for the ABB from 2015. In it, you will find our best arguments and an article referencing problems the listing has caused. Specifically, on page 2 you will find the paragraph that says:

- In the state of Oklahoma, the listing has cost \$6.5 million in protection efforts over the last 20 years, including \$1.3 million that the Oklahoma Department of Transportation spent on Conservation actions in a 6- year time span ([Palmer 2015](#)).
- The erroneous listing of the ABB has caused delays of essential road and bridge projects and costs Oklahoma taxpayers ([Smoot 2015](#)).
- The ABB listing has also caused issues with the development of the Keystone XL Pipeline, a \$5.3 billion project, related to permitting and protection for the ABB as well as related lawsuits ([Laskow 2012](#); Snyder 2013).

Additionally, one of our members agreed to share what they have spent to date on the ABB. The company is Markwest. They asked that you please not share with others outside DOI without permission because they quickly assembled this figures for me this morning.

ABB consultant #1	\$345,000.00
ABB consultant #2	\$159,000.00
Outside legal fees	\$316,325.80
In-house legal fees and other specific ABB internal costs	\$250,000.00
ABB survey consultant #1	\$553,622.94
ABB survey consultant #2	\$90,212.00
Additional Construction costs to implement the ABB Protocol	\$810,000.00
Travel costs for USFWS ABB meetings (OK & NM)	\$14,137.48
ABB Conservation Bank #1	\$6,280,900.00
ABB Conservation Bank #2	\$167,200.00
	\$8,986,398.22

More recently, I also had an email today from a Producer in Osage Co, Oklahoma

who said he lost 5 of 10 drill sites due to updated beetle surveys. These are "Osage Mineral Estate" wells that he's trying to drill. The Osage Indian mineral estate owns 100% of the minerals, so this is their minerals/money that's being interfered with. With time, I can ask him to speculate the lost revenue from these projects. Just give me the word. They did not have the staff available to make the calculations that Markwest did this morning.

I'm hunting down an exact figure, but I heard from a reliable source that the Oklahoma Department of Transportation has budgeted close to a million for ABB mitigation for a single project. Will report back when I get a figure you can use.

Aside from the costs, we have concerns about the modeling used in the draft Species Status Assessment, which is used as guidance to make the listing determination. This document is very heavy on climate change impacts. All modeling is done using the Fifth Assessment Report of the Intergovernmental Panel on Climate Change. While I am not too familiar with this organization or their work, I did some searching and found this [Forbes article](#) discrediting the IPCC, citing irresponsible science practices (intentionally manipulating data, suppressing legitimate opposing arguments, etc.). This may be something to look into and push back on, since most of the climate changes threat analysis in the SSA is based on this work. It should also be noted that this kind of modeling makes a lot of assumptions, so overall outcomes could be way off.

Thank you for interest and attention to this species. Please let me know what additional items I can provide.

Best,

Sam

Samantha McDonald

Director of Government Relations

Independent Petroleum Association of America

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