

## Conversation Contents

### V&F Paper

#### Attachments:

/18. V&F Paper/1.1 2017 03 31 VF CRA Briefing Memo\_KM comments MDN 4-4-17.docx

/18. V&F Paper/6.1 2017 03 31 VF CRA Briefing Memo\_KM comments MDN 4-4-17.jt.docx

/18. V&F Paper/9.1 2017 03 31 VF CRA Briefing Memo\_KM comments MDN 4-4-17.jt.cmr.docx

/18. V&F Paper/14.1 2017 04 05 VF CRA Briefing Memo.docx

---

### Michael Nedd <mnedd@blm.gov>

**From:** Michael Nedd <mnedd@blm.gov>  
**Sent:** Tue Apr 04 2017 10:35:53 GMT-0600 (MDT)  
**To:** Timothy Spisak <tspisak@blm.gov>, Lonny Bagley <lbagley@blm.gov>, Christopher Rhymes <christopher.rhymes@sol.doi.gov>  
**CC:** tshannon@blm.gov, Shannon Stewart <scstewar@blm.gov>  
**Subject:** V&F Paper  
**Attachments:** 2017 03 31 VF CRA Briefing Memo\_KM comments MDN 4-4-17.docx

See attached and I appreciate you and the team addressing the comments ASAP...

Take care and have a wonderful day! : )

Michael D. Nedd  
202-208-3801 Office  
202-208-5242 Fax  
[mnedd@blm.gov](mailto:mnedd@blm.gov)

A thought to consider "Do all the good you can, in all the ways you can, for all the people you can, while you can!"

---

### Timothy Spisak <tspisak@blm.gov>

**From:** Timothy Spisak <tspisak@blm.gov>  
**Sent:** Tue Apr 04 2017 11:18:24 GMT-0600 (MDT)  
**To:** Lonny Bagley <lbagley@blm.gov>, Christopher Rhymes <christopher.rhymes@sol.doi.gov>  
**CC:** "Tichenor, James C" <jtichenor@blm.gov>  
**Subject:** RE: V&F Paper

Chris, James is taking a shot of the comments, but there is one regarding litigation risks. Do you have more information on that one?

Thanks  
Tim

'Serenity Now!' – Frank Costanza, *Seinfeld*, 1997  
'Serenity now, insanity later' – Lloyd Braun, *Seinfeld*, 1997

\*\*\*\*\*

Timothy 'Tim' R. Spisak  
Acting Assistant Director,  
Energy, Minerals & Realty Management, WO-300  
DOI-Bureau of Land Management  
[tspisak@blm.gov](mailto:tspisak@blm.gov)  
(202) 208-4201 office  
(202) 251-3079 cell

\*\*\*\*\*

---

**From:** Michael Nedd [mailto:[mnedd@blm.gov](mailto:mnedd@blm.gov)]  
**Sent:** Tuesday, April 04, 2017 12:36 PM  
**To:** Timothy Spisak; Lonny Bagley; Christopher Rhymes  
**Cc:** [tshannon@blm.gov](mailto:tshannon@blm.gov); Shannon Stewart  
**Subject:** V&F Paper

See attached and I appreciate you and the team addressing the comments ASAP...

**Take care and have a wonderful day! : )**

Michael D. Nedd  
202-208-3801 Office  
202-208-5242 Fax  
[mnedd@blm.gov](mailto:mnedd@blm.gov)

**A thought to consider "Do all the good you can, in all the ways you can, for all the people you can, while you can!"**

**"Rhymes, Christopher" <[christopher.rhymes@sol.doi.gov](mailto:christopher.rhymes@sol.doi.gov)>**

---

**From:** "Rhymes, Christopher" <[christopher.rhymes@sol.doi.gov](mailto:christopher.rhymes@sol.doi.gov)>  
**Sent:** Tue Apr 04 2017 11:46:08 GMT-0600 (MDT)  
**To:** Timothy Spisak <[tspisak@blm.gov](mailto:tspisak@blm.gov)>  
**CC:** Lonny Bagley <[lbagley@blm.gov](mailto:lbagley@blm.gov)>, "Tichenor, James C" <[jtichenor@blm.gov](mailto:jtichenor@blm.gov)>  
**Subject:** Re: V&F Paper

**(b) (5)**



On Tue, Apr 4, 2017 at 1:18 PM, Timothy Spisak <[tspisak@blm.gov](mailto:tspisak@blm.gov)> wrote:  
| Chris, James is taking a shot of the comments, but there is one regarding litigation risks. Do you have

more information on that one?

Thanks  
Tim

'Serenity Now!' – Frank Costanza, *Seinfeld*, 1997  
'Serenity now, insanity later' – Lloyd Braun, *Seinfeld*, 1997

\*\*\*\*\*  
Timothy 'Tim' R. Spisak  
Acting Assistant Director,  
Energy, Minerals & Realty Management, WO-300  
DOI-Bureau of Land Management  
[tspisak@blm.gov](mailto:tspisak@blm.gov)  
(202) 208-4201 office  
(202) 251-3079 cell  
\*\*\*\*\*

---

**From:** Michael Nedd [mailto:[mnedd@blm.gov](mailto:mnedd@blm.gov)]  
**Sent:** Tuesday, April 04, 2017 12:36 PM  
**To:** Timothy Spisak; Lonny Bagley; Christopher Rhymes  
**Cc:** [tshannon@blm.gov](mailto:tshannon@blm.gov); Shannon Stewart  
**Subject:** V&F Paper

See attached and I appreciate you and the team addressing the comments ASAP...

**Take care and have a wonderful day! : )**

Michael D. Nedd  
202-208-3801 Office  
202-208-5242 Fax  
[mnedd@blm.gov](mailto:mnedd@blm.gov)

**A thought to consider "Do all the good you can, in all the ways you can, for all the people you can, while you can!"**

--

**Christopher M. Rhymes** | Attorney-Advisor, Division of Mineral Resources  
Office of the Solicitor | United States Department of the Interior  
1849 C Street NW, #5354 | Washington, DC 20240  
Phone: (202) 208-4307 | Email: [christopher.rhymes@sol.doi.gov](mailto:christopher.rhymes@sol.doi.gov)

---

**"Rhymes, Christopher" <[christopher.rhymes@sol.doi.gov](mailto:christopher.rhymes@sol.doi.gov)>**

**From:** "Rhymes, Christopher" <[christopher.rhymes@sol.doi.gov](mailto:christopher.rhymes@sol.doi.gov)>  
**Sent:** Tue Apr 04 2017 12:28:24 GMT-0600 (MDT)  
**To:** Timothy Spisak <[tspisak@blm.gov](mailto:tspisak@blm.gov)>  
**CC:** Lonny Bagley <[lbagley@blm.gov](mailto:lbagley@blm.gov)>, "Tichenor, James C" <[jtichenor@blm.gov](mailto:jtichenor@blm.gov)>  
**Subject:** Re: V&F Paper

James,

Whenever you get done with the comments, please give me a chance to review.

Also, I wanted to point out that the expected rulemaking costs for both scenarios are 1.2 to 2 million. (b) (5)

Chris

On Tue, Apr 4, 2017 at 1:46 PM, Rhymes, Christopher <[christopher.rhymes@sol.doi.gov](mailto:christopher.rhymes@sol.doi.gov)> wrote:

(b) (5)

On Tue, Apr 4, 2017 at 1:18 PM, Timothy Spisak <[tspisak@blm.gov](mailto:tspisak@blm.gov)> wrote:

Chris, James is taking a shot of the comments, but there is one regarding litigation risks. Do you have more information on that one?

Thanks  
Tim

'Serenity Now!' – Frank Costanza, *Seinfeld*, 1997  
'Serenity now, insanity later' – Lloyd Braun, *Seinfeld*, 1997

\*\*\*\*\*

Timothy 'Tim' R. Spisak  
Acting Assistant Director,  
Energy, Minerals & Realty Management, WO-300  
DOI-Bureau of Land Management  
[tspisak@blm.gov](mailto:tspisak@blm.gov)  
(202) 208-4201 office  
(202) 251-3079 cell

\*\*\*\*\*

---

**From:** Michael Nedd [mailto:[mnedd@blm.gov](mailto:mnedd@blm.gov)]  
**Sent:** Tuesday, April 04, 2017 12:36 PM  
**To:** Timothy Spisak; Lonny Bagley; Christopher Rhymes  
**Cc:** [tshannon@blm.gov](mailto:tshannon@blm.gov); Shannon Stewart  
**Subject:** V&F Paper

See attached and I appreciate you and the team addressing the comments ASAP...

**Take care and have a wonderful day! : )**

Michael D. Nedd  
202-208-3801 Office  
202-208-5242 Fax  
[mnedd@blm.gov](mailto:mnedd@blm.gov)

**A thought to consider "Do all the good you can, in all the ways you can, for all the people you can, while you can!"**

**Christopher M. Rhymes** | Attorney-Advisor, Division of Mineral Resources  
Office of the Solicitor | United States Department of the Interior  
1849 C Street NW, #5354 | Washington, DC 20240  
Phone: (202) 208-4307 | Email: [christopher.rhymes@sol.doi.gov](mailto:christopher.rhymes@sol.doi.gov)

--

**Christopher M. Rhymes** | Attorney-Advisor, Division of Mineral Resources  
Office of the Solicitor | United States Department of the Interior  
1849 C Street NW, #5354 | Washington, DC 20240  
Phone: (202) 208-4307 | Email: [christopher.rhymes@sol.doi.gov](mailto:christopher.rhymes@sol.doi.gov)

**Timothy Spisak <[tspisak@blm.gov](mailto:tspisak@blm.gov)>**

---

**From:** Timothy Spisak <[tspisak@blm.gov](mailto:tspisak@blm.gov)>  
**Sent:** Tue Apr 04 2017 12:30:54 GMT-0600 (MDT)  
**To:** Christopher Rhymes <[christopher.rhymes@sol.doi.gov](mailto:christopher.rhymes@sol.doi.gov)>  
**CC:** Lonny Bagley <[lbagley@blm.gov](mailto:lbagley@blm.gov)>, James Tichenor <[jtichenor@blm.gov](mailto:jtichenor@blm.gov)>  
**Subject:** RE: V&F Paper

Sure, it wasn't that much of a cost, and I figured it be within the range.

(b) (5)

Thanks  
Tim

'Serenity Now!' – Frank Costanza, *Seinfeld*, 1997  
'Serenity now, insanity later' – Lloyd Braun, *Seinfeld*, 1997

\*\*\*\*\*  
Timothy 'Tim' R. Spisak  
Acting Assistant Director,  
Energy, Minerals & Realty Management, WO-300  
DOI-Bureau of Land Management  
[tspisak@blm.gov](mailto:tspisak@blm.gov)  
(202) 208-4201 office  
(202) 251-3079 cell  
\*\*\*\*\*

**From:** Rhymes, Christopher [mailto:[christopher.rhymes@sol.doi.gov](mailto:christopher.rhymes@sol.doi.gov)]  
**Sent:** Tuesday, April 04, 2017 2:28 PM  
**To:** Timothy Spisak  
**Cc:** Lonny Bagley; Tichenor, James C  
**Subject:** Re: V&F Paper

James,

Whenever you get done with the comments, please give me a chance to review.

Also, I wanted to point out that the expected rulemaking costs for both scenarios are 1.2 to 2 million.

(b) (5)

Chris

On Tue, Apr 4, 2017 at 1:46 PM, Rhymes, Christopher <[christopher.rhymes@sol.doi.gov](mailto:christopher.rhymes@sol.doi.gov)> wrote:

(b) (5)

On Tue, Apr 4, 2017 at 1:18 PM, Timothy Spisak <[tspisak@blm.gov](mailto:tspisak@blm.gov)> wrote:

Chris, James is taking a shot of the comments, but there is one regarding litigation risks. Do you have more information on that one?

Thanks  
Tim

'Serenity Now!' – Frank Costanza, *Seinfeld*, 1997  
'Serenity now, insanity later' – Lloyd Braun, *Seinfeld*, 1997

\*\*\*\*\*

Timothy 'Tim' R. Spisak  
Acting Assistant Director,  
Energy, Minerals & Realty Management, WO-300  
DOI-Bureau of Land Management  
[tspisak@blm.gov](mailto:tspisak@blm.gov)  
(202) 208-4201 office  
(202) 251-3079 cell  
\*\*\*\*\*

---

**From:** Michael Nedd [mailto:[mnedd@blm.gov](mailto:mnedd@blm.gov)]  
**Sent:** Tuesday, April 04, 2017 12:36 PM  
**To:** Timothy Spisak; Lonny Bagley; Christopher Rhymes  
**Cc:** [tshannon@blm.gov](mailto:tshannon@blm.gov); Shannon Stewart  
**Subject:** V&F Paper

See attached and I appreciate you and the team addressing the comments ASAP...

**Take care and have a wonderful day! : )**

Michael D. Nedd  
202-208-3801 Office  
202-208-5242 Fax  
[mnedd@blm.gov](mailto:mnedd@blm.gov)

**A thought to consider "Do all the good you can, in all the ways you can, for all the people you can, while you can!"**

--  
**Christopher M. Rhymes** | Attorney-Advisor, Division of Mineral Resources  
Office of the Solicitor | United States Department of the Interior  
1849 C Street NW, #5354 | Washington, DC 20240  
Phone: (202) 208-4307 | Email: [christopher.rhymes@sol.doi.gov](mailto:christopher.rhymes@sol.doi.gov)

--  
**Christopher M. Rhymes** | Attorney-Advisor, Division of Mineral Resources  
Office of the Solicitor | United States Department of the Interior

**"Tichenor, James" <jtichenor@blm.gov>**

---

**From:** "Tichenor, James" <jtichenor@blm.gov>  
**Sent:** Tue Apr 04 2017 12:51:52 GMT-0600 (MDT)  
**To:** Timothy Spisak <tspisak@blm.gov>  
**CC:** Christopher Rhymes <christopher.rhymes@sol.doi.gov>, Lonny Bagley <lbagley@blm.gov>  
**Subject:** Re: V&F Paper  
**Attachments:** 2017 03 31 VF CRA Briefing Memo\_KM comments MDN 4-4-17.jt.docx

See attached. The same schedule seemed to be repeated twice in bullets so I consolidated them. Two questions: was there a timeframe agreed on for the "most expedited rule"? and I think the litigation risk goes beyond costs, right?

On Tue, Apr 4, 2017 at 11:30 AM, Timothy Spisak <tspisak@blm.gov> wrote:

Sure, it wasn't that much of a cost, and I figured it be within the range. (b) (5)

Thanks  
Tim

'Serenity Now!' – Frank Costanza, *Seinfeld*, 1997  
'Serenity now, insanity later' – Lloyd Braun, *Seinfeld*, 1997

\*\*\*\*\*  
Timothy 'Tim' R. Spisak  
Acting Assistant Director,  
Energy, Minerals & Realty Management, WO-300  
DOI-Bureau of Land Management  
[tspisak@blm.gov](mailto:tspisak@blm.gov)  
(202) 208-4201 office  
(202) 251-3079 cell  
\*\*\*\*\*

**From:** Rhymes, Christopher [mailto:[christopher.rhymes@sol.doi.gov](mailto:christopher.rhymes@sol.doi.gov)]  
**Sent:** Tuesday, April 04, 2017 2:28 PM  
**To:** Timothy Spisak  
**Cc:** Lonny Bagley; Tichenor, James C  
**Subject:** Re: V&F Paper

James,

Whenever you get done with the comments, please give me a chance to review.

Also, I wanted to point out that the expected rulemaking costs for both scenarios are 1.2 to 2 million.

(b) (5)

Chris

On Tue, Apr 4, 2017 at 1:46 PM, Rhymes, Christopher <[christopher.rhymes@sol.doi.gov](mailto:christopher.rhymes@sol.doi.gov)> wrote:

(b) (5)

(b) (5)

On Tue, Apr 4, 2017 at 1:18 PM, Timothy Spisak <[tspisak@blm.gov](mailto:tspisak@blm.gov)> wrote:  
Chris, James is taking a shot of the comments, but there is one regarding litigation risks. Do you have more information on that one?

Thanks  
Tim

'Serenity Now!' – Frank Costanza, *Seinfeld*, 1997  
'Serenity now, insanity later' – Lloyd Braun, *Seinfeld*, 1997

\*\*\*\*\*

Timothy 'Tim' R. Spisak  
Acting Assistant Director,  
Energy, Minerals & Realty Management, WO-300  
DOI-Bureau of Land Management  
[tspisak@blm.gov](mailto:tspisak@blm.gov)  
(202) 208-4201 office  
(202) 251-3079 cell

\*\*\*\*\*

---

**From:** Michael Nedd [mailto:[mnedd@blm.gov](mailto:mnedd@blm.gov)]  
**Sent:** Tuesday, April 04, 2017 12:36 PM  
**To:** Timothy Spisak; Lonny Bagley; Christopher Rhymes  
**Cc:** [tshannon@blm.gov](mailto:tshannon@blm.gov); Shannon Stewart  
**Subject:** V&F Paper

See attached and I appreciate you and the team addressing the comments ASAP...

**Take care and have a wonderful day! : )**

Michael D. Nedd  
202-208-3801 Office  
202-208-5242 Fax  
[mnedd@blm.gov](mailto:mnedd@blm.gov)

**A thought to consider "Do all the good you can, in all the ways you can, for all the people you can, while you can!"**

--

**Christopher M. Rhymes** | Attorney-Advisor, Division of Mineral Resources  
Office of the Solicitor | United States Department of the Interior  
1849 C Street NW, #5354 | Washington, DC 20240  
Phone: (202) 208-4307 | Email: [christopher.rhymes@sol.doi.gov](mailto:christopher.rhymes@sol.doi.gov)

--

**Christopher M. Rhymes** | Attorney-Advisor, Division of Mineral Resources  
Office of the Solicitor | United States Department of the Interior  
1849 C Street NW, #5354 | Washington, DC 20240  
Phone: (202) 208-4307 | Email: [christopher.rhymes@sol.doi.gov](mailto:christopher.rhymes@sol.doi.gov)

--

James Tichenor  
Economist  
Energy, Minerals, and Realty Management Directorate WO-300  
Bureau of Land Management  
[jtichenor@blm.gov](mailto:jtichenor@blm.gov)  
202-573-0536

**Timothy Spisak <[tspisak@blm.gov](mailto:tspisak@blm.gov)>**

---

**From:** Timothy Spisak <[tspisak@blm.gov](mailto:tspisak@blm.gov)>  
**Sent:** Tue Apr 04 2017 13:06:47 GMT-0600 (MDT)  
**To:** "Tichenor, James" <[jtichenor@blm.gov](mailto:jtichenor@blm.gov)>  
**CC:** Christopher Rhymes <[christopher.rhymes@sol.doi.gov](mailto:christopher.rhymes@sol.doi.gov)>, Lonny Bagley <[lbagley@blm.gov](mailto:lbagley@blm.gov)>  
**Subject:** Re: V&F Paper

Need to have the two separate schedules as they under two different conditions. They didn't question it and I'd hate to change it now and trigger a bunch of new questions.

Sent from my iPhone

On Apr 4, 2017, at 2:52 PM, Tichenor, James <[jtichenor@blm.gov](mailto:jtichenor@blm.gov)> wrote:

See attached. The same schedule seemed to be repeated twice in bullets so I consolidated them. Two questions: was there a timeframe agreed on for the "most expedited rule"? and I think the litigation risk goes beyond costs, right?

On Tue, Apr 4, 2017 at 11:30 AM, Timothy Spisak <[tspisak@blm.gov](mailto:tspisak@blm.gov)> wrote:

Sure, it wasn't that much of a cost, and I figured it be within the range. (b) (5)

Thanks  
Tim

'Serenity Now!' – Frank Costanza, *Seinfeld*, 1997  
'Serenity now, insanity later' – Lloyd Braun, *Seinfeld*, 1997

\*\*\*\*\*

Timothy 'Tim' R. Spisak  
Acting Assistant Director,  
Energy, Minerals & Realty Management, WO-300  
DOI-Bureau of Land Management  
[tspisak@blm.gov](mailto:tspisak@blm.gov)  
(202) 208-4201 office  
(202) 251-3079 cell  
\*\*\*\*\*

**From:** Rhymes, Christopher [mailto:[christopher.rhymes@sol.doi.gov](mailto:christopher.rhymes@sol.doi.gov)]  
**Sent:** Tuesday, April 04, 2017 2:28 PM  
**To:** Timothy Spisak  
**Cc:** Lonny Bagley; Tichenor, James C  
**Subject:** Re: V&F Paper

James,

Whenever you get done with the comments, please give me a chance to review.

Also, I wanted to point out that the expected rulemaking costs for both scenarios are 1.2 to 2 million. (b) (5)

Chris

On Tue, Apr 4, 2017 at 1:46 PM, Rhymes, Christopher <[christopher.rhymes@sol.doi.gov](mailto:christopher.rhymes@sol.doi.gov)> wrote:

(b) (5)

On Tue, Apr 4, 2017 at 1:18 PM, Timothy Spisak <[tspisak@blm.gov](mailto:tspisak@blm.gov)> wrote:  
Chris, James is taking a shot of the comments, but there is one regarding litigation risks. Do you have more information on that one?

Thanks  
Tim

'Serenity Now!' – Frank Costanza, *Seinfeld*, 1997  
'Serenity now, insanity later' – Lloyd Braun, *Seinfeld*, 1997

\*\*\*\*\*

Timothy 'Tim' R. Spisak  
Acting Assistant Director,  
Energy, Minerals & Realty Management, WO-300  
DOI-Bureau of Land Management  
[tspisak@blm.gov](mailto:tspisak@blm.gov)  
(202) 208-4201 office  
(202) 251-3079 cell

\*\*\*\*\*

---

**From:** Michael Nedd [mailto:[mnedd@blm.gov](mailto:mnedd@blm.gov)]  
**Sent:** Tuesday, April 04, 2017 12:36 PM  
**To:** Timothy Spisak; Lonny Bagley; Christopher Rhymes  
**Cc:** [tshannon@blm.gov](mailto:tshannon@blm.gov); Shannon Stewart  
**Subject:** V&F Paper

See attached and I appreciate you and the team addressing the comments ASAP...

**Take care and have a wonderful day! : )**

Michael D. Nedd  
202-208-3801 Office  
202-208-5242 Fax  
[mnedd@blm.gov](mailto:mnedd@blm.gov)

**A thought to consider "Do all the good you can, in all the ways you can, for all the people you can, while you can!"**

--

Christopher M. Rhymes | Attorney-Advisor, Division of Mineral Resources

Office of the Solicitor | United States Department of the Interior  
1849 C Street NW, #5354 | Washington, DC 20240  
Phone: (202) 208-4307 | Email: [christopher.rhymes@sol.doi.gov](mailto:christopher.rhymes@sol.doi.gov)

--

**Christopher M. Rhymes** | Attorney-Advisor, Division of Mineral Resources  
Office of the Solicitor | United States Department of the Interior  
1849 C Street NW, #5354 | Washington, DC 20240  
Phone: (202) 208-4307 | Email: [christopher.rhymes@sol.doi.gov](mailto:christopher.rhymes@sol.doi.gov)

--

James Tichenor  
Economist  
Energy, Minerals, and Realty Management Directorate WO-300  
Bureau of Land Management  
[jtichenor@blm.gov](mailto:jtichenor@blm.gov)  
202-573-0536

<2017 03 31 VF CRA Briefing Memo\_KM comments MDN 4-4-17.jt.docx>

## "Rhymes, Christopher" <[christopher.rhymes@sol.doi.gov](mailto:christopher.rhymes@sol.doi.gov)>

---

**From:** "Rhymes, Christopher" <[christopher.rhymes@sol.doi.gov](mailto:christopher.rhymes@sol.doi.gov)>  
**Sent:** Tue Apr 04 2017 13:13:14 GMT-0600 (MDT)  
**To:** Timothy Spisak <[tspisak@blm.gov](mailto:tspisak@blm.gov)>  
**CC:** "Tichenor, James" <[jtichenor@blm.gov](mailto:jtichenor@blm.gov)>, Lonny Bagley <[lbagley@blm.gov](mailto:lbagley@blm.gov)>  
**Subject:** Re: V&F Paper

I'll make this change. (b) (5)

Will reply with my edits soon.

On Tue, Apr 4, 2017 at 3:06 PM, Timothy Spisak <[tspisak@blm.gov](mailto:tspisak@blm.gov)> wrote:

Need to have the two separate schedules as they under two different conditions. They didn't question it and I'd hate to change it now and trigger a bunch of new questions.

Sent from my iPhone

On Apr 4, 2017, at 2:52 PM, Tichenor, James <[jtichenor@blm.gov](mailto:jtichenor@blm.gov)> wrote:

See attached. The same schedule seemed to be repeated twice in bullets so I consolidated them. Two questions: was there a timeframe agreed on for the "most expedited rule"? and I think the litigation risk goes beyond costs, right?

On Tue, Apr 4, 2017 at 11:30 AM, Timothy Spisak <[tspisak@blm.gov](mailto:tspisak@blm.gov)> wrote:

Sure, it wasn't that much of a cost, and I figured it be within the range. (b) (5)

Thanks

Tim

'Serenity Now!' – Frank Costanza, *Seinfeld*, 1997  
'Serenity now, insanity later' – Lloyd Braun, *Seinfeld*, 1997

\*\*\*\*\*

Timothy 'Tim' R. Spisak  
Acting Assistant Director,  
Energy, Minerals & Realty Management, WO-300  
DOI-Bureau of Land Management  
[tspisak@blm.gov](mailto:tspisak@blm.gov)  
(202) 208-4201 office  
(202) 251-3079 cell

\*\*\*\*\*

**From:** Rhymes, Christopher [mailto:[christopher.rhymes@sol.doi.gov](mailto:christopher.rhymes@sol.doi.gov)]  
**Sent:** Tuesday, April 04, 2017 2:28 PM  
**To:** Timothy Spisak  
**Cc:** Lonny Bagley; Tichenor, James C  
**Subject:** Re: V&F Paper

James,

Whenever you get done with the comments, please give me a chance to review.

Also, I wanted to point out that the expected rulemaking costs for both scenarios are 1.2 to 2 million. (b) (5)

Chris

On Tue, Apr 4, 2017 at 1:46 PM, Rhymes, Christopher <[christopher.rhymes@sol.doi.gov](mailto:christopher.rhymes@sol.doi.gov)> wrote:

(b) (5)

On Tue, Apr 4, 2017 at 1:18 PM, Timothy Spisak <[tspisak@blm.gov](mailto:tspisak@blm.gov)> wrote:  
Chris, James is taking a shot of the comments, but there is one regarding litigation risks. Do you have more information on that one?

Thanks  
Tim

'Serenity Now!' – Frank Costanza, *Seinfeld*, 1997  
'Serenity now, insanity later' – Lloyd Braun, *Seinfeld*, 1997

\*\*\*\*\*

Timothy 'Tim' R. Spisak  
Acting Assistant Director,  
Energy, Minerals & Realty Management, WO-300  
DOI-Bureau of Land Management  
[tspisak@blm.gov](mailto:tspisak@blm.gov)  
(202) 208-4201 office  
(202) 251-3079 cell

\*\*\*\*\*

---

**From:** Michael Nedd [mailto:[mnedd@blm.gov](mailto:mnedd@blm.gov)]  
**Sent:** Tuesday, April 04, 2017 12:36 PM

**To:** Timothy Spisak; Lonny Bagley; Christopher Rhymes  
**Cc:** [tshannon@blm.gov](mailto:tshannon@blm.gov); Shannon Stewart  
**Subject:** V&F Paper

See attached and I appreciate you and the team addressing the comments ASAP...

**Take care and have a wonderful day! : )**

Michael D. Nedd  
202-208-3801 Office  
202-208-5242 Fax  
[mnedd@blm.gov](mailto:mnedd@blm.gov)

**A thought to consider "Do all the good you can, in all the ways you can, for all the people you can, while you can!"**

--

**Christopher M. Rhymes** | Attorney-Advisor, Division of Mineral Resources  
Office of the Solicitor | United States Department of the Interior  
1849 C Street NW, #5354 | Washington, DC 20240  
Phone: (202) 208-4307 | Email: [christopher.rhymes@sol.doi.gov](mailto:christopher.rhymes@sol.doi.gov)

--

**Christopher M. Rhymes** | Attorney-Advisor, Division of Mineral Resources  
Office of the Solicitor | United States Department of the Interior  
1849 C Street NW, #5354 | Washington, DC 20240  
Phone: (202) 208-4307 | Email: [christopher.rhymes@sol.doi.gov](mailto:christopher.rhymes@sol.doi.gov)

--

James Tichenor  
Economist  
Energy, Minerals, and Realty Management Directorate WO-300  
Bureau of Land Management  
[jtichenor@blm.gov](mailto:jtichenor@blm.gov)  
202-573-0536

<2017 03 31 VF CRA Briefing Memo\_KM comments MDN 4-4-17.jt.docx>

--

**Christopher M. Rhymes** | Attorney-Advisor, Division of Mineral Resources  
Office of the Solicitor | United States Department of the Interior  
1849 C Street NW, #5354 | Washington, DC 20240  
Phone: (202) 208-4307 | Email: [christopher.rhymes@sol.doi.gov](mailto:christopher.rhymes@sol.doi.gov)

---

**"Rhymes, Christopher" <[christopher.rhymes@sol.doi.gov](mailto:christopher.rhymes@sol.doi.gov)>**

**From:** "Rhymes, Christopher" <christopher.rhymes@sol.doi.gov>  
**Sent:** Tue Apr 04 2017 13:43:57 GMT-0600 (MDT)  
**To:** Timothy Spisak <tspisak@blm.gov>  
**CC:** "Tichenor, James" <jtichenor@blm.gov>, Lonny Bagley <lbagley@blm.gov>  
**Subject:** Re: V&F Paper  
**Attachments:** 2017 03 31 VF CRA Briefing Memo\_KM comments MDN 4-4-17.jt.cmr.docx

Tim,

Here are my edits. I put the repetitive bullet list back in, but left James' table at the end in case you find it preferable. (b) (5)

[REDACTED]. Unfortunately, the memo is now slightly longer than 2 pages.

Once this is cleaned up and passed on, please send me a copy so that I can share with Karen.

Chris

On Tue, Apr 4, 2017 at 3:13 PM, Rhymes, Christopher <[christopher.rhymes@sol.doi.gov](mailto:christopher.rhymes@sol.doi.gov)> wrote:

I'll make this change. (b) (5)

[REDACTED] Will reply with my edits soon.

On Tue, Apr 4, 2017 at 3:06 PM, Timothy Spisak <[tspisak@blm.gov](mailto:tspisak@blm.gov)> wrote:

Need to have the two separate schedules as they under two different conditions. They didn't question it and I'd hate to change it now and trigger a bunch of new questions.

Sent from my iPhone

On Apr 4, 2017, at 2:52 PM, Tichenor, James <[jtichenor@blm.gov](mailto:jtichenor@blm.gov)> wrote:

See attached. The same schedule seemed to be repeated twice in bullets so I consolidated them. Two questions: was there a timeframe agreed on for the "most expedited rule"? and I think the litigation risk goes beyond costs, right?

On Tue, Apr 4, 2017 at 11:30 AM, Timothy Spisak <[tspisak@blm.gov](mailto:tspisak@blm.gov)> wrote:

Sure, it wasn't that much of a cost, and I figured it be within the range. (b) (5)

Thanks  
Tim

'Serenity Now!' – Frank Costanza, *Seinfeld*, 1997  
'Serenity now, insanity later' – Lloyd Braun, *Seinfeld*, 1997

\*\*\*\*\*

Timothy 'Tim' R. Spisak  
Acting Assistant Director,  
Energy, Minerals & Realty Management, WO-300  
DOI-Bureau of Land Management  
[tspisak@blm.gov](mailto:tspisak@blm.gov)  
(202) 208-4201 office  
(202) 251-3079 cell

\*\*\*\*\*

**From:** Rhymes, Christopher [mailto:[christopher.rhymes@sol.doi.gov](mailto:christopher.rhymes@sol.doi.gov)]  
**Sent:** Tuesday, April 04, 2017 2:28 PM  
**To:** Timothy Spisak  
**Cc:** Lonny Bagley; Tichenor, James C  
**Subject:** Re: V&F Paper

James,

Whenever you get done with the comments, please give me a chance to review.

Also, I wanted to point out that the expected rulemaking costs for both scenarios are 1.2 to 2 million. (b) (5)

Chris

On Tue, Apr 4, 2017 at 1:46 PM, Rhymes, Christopher <[christopher.rhymes@sol.doi.gov](mailto:christopher.rhymes@sol.doi.gov)> wrote:

(b) (5)

On Tue, Apr 4, 2017 at 1:18 PM, Timothy Spisak <[tspisak@blm.gov](mailto:tspisak@blm.gov)> wrote:  
Chris, James is taking a shot of the comments, but there is one regarding litigation risks. Do you have more information on that one?

Thanks  
Tim

'Serenity Now!' – Frank Costanza, *Seinfeld*, 1997  
'Serenity now, insanity later' – Lloyd Braun, *Seinfeld*, 1997

\*\*\*\*\*  
Timothy 'Tim' R. Spisak  
Acting Assistant Director,  
Energy, Minerals & Realty Management, WO-300  
DOI-Bureau of Land Management  
[tspisak@blm.gov](mailto:tspisak@blm.gov)  
(202) 208-4201 office  
(202) 251-3079 cell  
\*\*\*\*\*

---

**From:** Michael Nedd [mailto:[mnedd@blm.gov](mailto:mnedd@blm.gov)]  
**Sent:** Tuesday, April 04, 2017 12:36 PM  
**To:** Timothy Spisak; Lonny Bagley; Christopher Rhymes  
**Cc:** [tshannon@blm.gov](mailto:tshannon@blm.gov); Shannon Stewart  
**Subject:** V&F Paper

See attached and I appreciate you and the team addressing the comments ASAP...

**Take care and have a wonderful day! : )**

Michael D. Nedd  
202-208-3801 Office  
202-208-5242 Fax  
[mnedd@blm.gov](mailto:mnedd@blm.gov)

**A thought to consider "Do all the good you can, in all the ways you can, for all the people you can, while you can!"**

--

**Christopher M. Rhymes** | Attorney-Advisor, Division of Mineral Resources  
Office of the Solicitor | United States Department of the Interior  
1849 C Street NW, #5354 | Washington, DC 20240  
Phone: (202) 208-4307 | Email: [christopher.rhymes@sol.doi.gov](mailto:christopher.rhymes@sol.doi.gov)

--

**Christopher M. Rhymes** | Attorney-Advisor, Division of Mineral Resources  
Office of the Solicitor | United States Department of the Interior  
1849 C Street NW, #5354 | Washington, DC 20240  
Phone: (202) 208-4307 | Email: [christopher.rhymes@sol.doi.gov](mailto:christopher.rhymes@sol.doi.gov)

--

James Tichenor  
Economist  
Energy, Minerals, and Realty Management Directorate WO-300  
Bureau of Land Management  
[jtichenor@blm.gov](mailto:jtichenor@blm.gov)  
202-573-0536

<2017 03 31 VF CRA Briefing Memo\_KM comments MDN 4-4-17.jt.docx>

--

**Christopher M. Rhymes** | Attorney-Advisor, Division of Mineral Resources  
Office of the Solicitor | United States Department of the Interior  
1849 C Street NW, #5354 | Washington, DC 20240  
Phone: (202) 208-4307 | Email: [christopher.rhymes@sol.doi.gov](mailto:christopher.rhymes@sol.doi.gov)

--

**Christopher M. Rhymes** | Attorney-Advisor, Division of Mineral Resources  
Office of the Solicitor | United States Department of the Interior  
1849 C Street NW, #5354 | Washington, DC 20240  
Phone: (202) 208-4307 | Email: [christopher.rhymes@sol.doi.gov](mailto:christopher.rhymes@sol.doi.gov)

**Timothy Spisak** <[tspisak@blm.gov](mailto:tspisak@blm.gov)>

---

**From:** Timothy Spisak <[tspisak@blm.gov](mailto:tspisak@blm.gov)>  
**Sent:** Tue Apr 04 2017 13:53:05 GMT-0600 (MDT)  
**To:** "Rhymes, Christopher" <[christopher.rhymes@sol.doi.gov](mailto:christopher.rhymes@sol.doi.gov)>

**CC:** "Tichenor, James" <jtichenor@blm.gov>, Lonny Bagley <lbagley@blm.gov>  
**Subject:** Re: V&F Paper

Will take a look.  
Thanks!

Sent from my iPhone

On Apr 4, 2017, at 3:44 PM, Rhymes, Christopher <[christopher.rhymes@sol.doi.gov](mailto:christopher.rhymes@sol.doi.gov)> wrote:

Tim,

Here are my edits. I put the repetitive bullet list back in, but left James' table at the end in case you find it preferable. (b) (5)

Unfortunately, the memo is now slightly longer than 2 pages.

Once this is cleaned up and passed on, please send me a copy so that I can share with Karen.

Chris

On Tue, Apr 4, 2017 at 3:13 PM, Rhymes, Christopher <[christopher.rhymes@sol.doi.gov](mailto:christopher.rhymes@sol.doi.gov)> wrote:

I'll make this change. (b) (5)

Will reply with my edits soon.

On Tue, Apr 4, 2017 at 3:06 PM, Timothy Spisak <[tspisak@blm.gov](mailto:tspisak@blm.gov)> wrote:

Need to have the two separate schedules as they under two different conditions. They didn't question it and I'd hate to change it now and trigger a bunch of new questions.

Sent from my iPhone

On Apr 4, 2017, at 2:52 PM, Tichenor, James <[jtichenor@blm.gov](mailto:jtichenor@blm.gov)> wrote:

See attached. The same schedule seemed to be repeated twice in bullets so I consolidated them. Two questions: was there a timeframe agreed on for the "most expedited rule"? and I think the litigation risk goes beyond costs, right?

On Tue, Apr 4, 2017 at 11:30 AM, Timothy Spisak <[tspisak@blm.gov](mailto:tspisak@blm.gov)> wrote:

Sure, it wasn't that much of a cost, and I figured it be within the range.

(b) (5)

Thanks  
Tim

'Serenity Now!' – Frank Costanza, *Seinfeld*, 1997  
'Serenity now, insanity later' – Lloyd Braun, *Seinfeld*, 1997

\*\*\*\*\*

Timothy 'Tim' R. Spisak  
Acting Assistant Director,

Energy, Minerals & Realty Management, WO-300  
DOI-Bureau of Land Management  
[tspisak@blm.gov](mailto:tspisak@blm.gov)  
(202) 208-4201 office  
(202) 251-3079 cell  
\*\*\*\*\*

**From:** Rhymes, Christopher [mailto:[christopher.rhymes@sol.doi.gov](mailto:christopher.rhymes@sol.doi.gov)]  
**Sent:** Tuesday, April 04, 2017 2:28 PM  
**To:** Timothy Spisak  
**Cc:** Lonny Bagley; Tichenor, James C  
**Subject:** Re: V&F Paper

James,

Whenever you get done with the comments, please give me a chance to review.

Also, I wanted to point out that the expected rulemaking costs for both scenarios are 1.2 to 2 million. (b) (5)

[Redacted]

Chris

On Tue, Apr 4, 2017 at 1:46 PM, Rhymes, Christopher  
<[christopher.rhymes@sol.doi.gov](mailto:christopher.rhymes@sol.doi.gov)> wrote:

(b) (5)

[Redacted]

[Redacted]

On Tue, Apr 4, 2017 at 1:18 PM, Timothy Spisak <[tspisak@blm.gov](mailto:tspisak@blm.gov)>  
wrote:

Chris, James is taking a shot of the comments, but there is one regarding litigation risks. Do you have more information on that one?

Thanks  
Tim

'Serenity Now!' – Frank Costanza, *Seinfeld*, 1997  
'Serenity now, insanity later' – Lloyd Braun, *Seinfeld*, 1997

\*\*\*\*\*

Timothy 'Tim' R. Spisak  
Acting Assistant Director,  
Energy, Minerals & Realty Management, WO-300  
DOI-Bureau of Land Management  
[tspisak@blm.gov](mailto:tspisak@blm.gov)  
(202) 208-4201 office  
(202) 251-3079 cell  
\*\*\*\*\*

---

**From:** Michael Nedd [mailto:[mnedd@blm.gov](mailto:mnedd@blm.gov)]  
**Sent:** Tuesday, April 04, 2017 12:36 PM  
**To:** Timothy Spisak; Lonny Bagley; Christopher Rhymes  
**Cc:** [tshannon@blm.gov](mailto:tshannon@blm.gov); Shannon Stewart  
**Subject:** V&F Paper

See attached and I appreciate you and the team addressing the comments ASAP...

**Take care and have a wonderful day! : )**

Michael D. Nedd  
202-208-3801 Office  
202-208-5242 Fax  
[mnedd@blm.gov](mailto:mnedd@blm.gov)

**A thought to consider "Do all the good you can, in all the ways you can, for all the people you can, while you can!"**

--

**Christopher M. Rhymes** | Attorney-Advisor, Division of Mineral Resources  
Office of the Solicitor | United States Department of the Interior  
1849 C Street NW, #5354 | Washington, DC 20240  
Phone: (202) 208-4307 | Email: [christopher.rhymes@sol.doi.gov](mailto:christopher.rhymes@sol.doi.gov)

--

**Christopher M. Rhymes** | Attorney-Advisor, Division of Mineral Resources  
Office of the Solicitor | United States Department of the Interior  
1849 C Street NW, #5354 | Washington, DC 20240  
Phone: (202) 208-4307 | Email: [christopher.rhymes@sol.doi.gov](mailto:christopher.rhymes@sol.doi.gov)

--

James Tichenor  
Economist  
Energy, Minerals, and Realty Management Directorate WO-300  
Bureau of Land Management  
[jtichenor@blm.gov](mailto:jtichenor@blm.gov)  
202-573-0536

<2017 03 31 VF CRA Briefing Memo\_KM comments MDN 4-4-17.jt.docx>

--

**Christopher M. Rhymes** | Attorney-Advisor, Division of Mineral Resources  
Office of the Solicitor | United States Department of the Interior  
1849 C Street NW, #5354 | Washington, DC 20240  
Phone: (202) 208-4307 | Email: [christopher.rhymes@sol.doi.gov](mailto:christopher.rhymes@sol.doi.gov)

--