

Robert Abbey
Reno, NV

June 11, 2009

Melinda J. Loftin
Designated Agency Ethics Official
and Director, Ethics Office
U.S. Department of the Interior
1849 C St. NW, MS 4251
Washington, DC 20240

Dear Ms. Loftin:

The purpose of this letter is to describe the steps that I will take to avoid any actual or apparent conflict of interest in the event that I am confirmed for the position of Director, Bureau of Land Management, Department of the Interior.

As required by 18 U.S.C. § 208(a), I will not participate personally and substantially in any particular matter that has a direct and predictable effect on my financial interests or those of any other person whose interests are imputed to me, unless I first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1), or qualify for a regulatory exemption, pursuant to 18 U.S.C. § 208(b)(2). I understand that the interests of the following persons are imputed to me: any spouse or minor child of mine; any general partner of a partnership in which I am a limited or general partner; any organization in which I serve as officer, director, trustee, general partner or employee; and any person or organization with which I am negotiating or have an arrangement concerning prospective employment.

I am a member of the land and minerals consulting firm of Abbey, Stubbs & Ford, LLC. Upon confirmation, I will withdraw from the firm, and the name of the firm will be changed so that it no longer includes my name. I currently have a membership interest in a capital account with the firm, but I will forfeit this interest upon my withdrawal from the firm and I will not receive any portion of this capital account as a consequence of my withdrawal. Pursuant to the firm's operating agreement, I will receive a *pro rata* membership share based on the value of my membership interests for services performed through the date of my withdrawal. These payments will be based solely on the firm's earnings through the date of my withdrawal from the firm and I will receive these payments prior to December 31, 2009. I expect to rejoin the firm as a member after termination of my Government service. I will not participate personally and substantially in any particular matter that has a direct and predictable effect on the financial interests of the firm.

In addition, I will not participate personally and substantially in any particular matter involving specific parties in which a former client of mine is a party or represents a party for a period of one year after I last provided service to that client, unless I am first authorized to participate, pursuant to 5 C.F.R. § 2635.502(d).

I am also a member of the land and minerals consulting firm of The A-Back Forty, LLC. I own a 99% membership interest in the firm and my wife owns the other 1% membership interest. Since January of 2006, the firm has had no clients and has not engaged in any business. The firm will remain dormant and will not advertise up to and during my appointment to the position of Director, Bureau of Land Management. During my appointment, I will not perform any services for the firm, except that I will comply with any requirements involving legal filings, taxes, and fees that are necessary to maintain the firm while it is in an inactive status. As Director, I will not participate personally and substantially in any particular matter that has a direct and predictable effect on the financial interests of the consulting firm of The A-Back Forty, LLC.

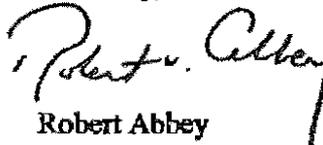
Upon confirmation, I will resign from my positions on the boards of directors of the following entities: Eastern Nevada Landscape Coalition and National Conservation System Foundation. For a period of one year after my resignation from these positions, I will not participate personally and substantially in any particular matter involving specific parties in which any of these entities is a party or represents a party, unless I am first authorized to participate, pursuant to 5 C.F.R. § 2635.502(d).

Upon confirmation, I will resign from my position on the advisory committee to the Dean of the University of Nevada College of Agriculture, Biotechnology, and Natural Resources. For a period of one year after my resignation, I will not participate personally and substantially in any particular matter involving specific parties in which the University of Nevada is a party or represents a party, unless I am first authorized to participate, pursuant to 5 C.F.R. § 2635.502(d).

If I am confirmed as Director, Bureau of Land Management, Department of the Interior, I am aware that I am prohibited by 30 U.S.C. § 1211(f) from holding a financial interest in any surface or underground coal mining operation. Additionally, I am aware that I am prohibited by 43 U.S.C. § 11 (implemented by 43 C.F.R. § 20.401) from directly or indirectly purchasing or becoming interested in the purchase of any of the public land. I am also aware that my position is subject to the prohibitions against holding any financial interest in Federal lands or resources administered or controlled by the Department of the Interior extended to me by supplemental regulation 5 C.F.R. § 3501.103. Therefore, I will not hold any such interests during my appointment to the position of Director.

Finally, I understand that as an appointee I am required to sign the Ethics Pledge (Exec. Order No. 13490) and that I will be bound by the requirements and restrictions therein in addition to the commitments that I have made in this and any other ethics agreement.

Sincerely,

A handwritten signature in cursive script that reads "Robert Abbey". The signature is written in dark ink and is positioned above the printed name.

Robert Abbey