

EXHIBIT II

Analysis of Billing History (3/24/03) for High Island, HD, and Owl Creek Ranches

HD Ranch Grazing Permit

- Last grazing bill (#R382339) paid was 12/27/01. Grazing bill contained livestock use in the Basin allotment (#568) from 6/15 until 9/15/01. This grazing bill should have completed billings for the HD Ranch permit through February 28, 2002.
- The WFO did not issue a March 1, 2002 grazing bill for grazing use on allotments #'s 661, 568, 569, 584, 585, 586, 587, 680, and 681. These allotments are on advanced billing. Use supervision reports stated livestock use did occur on these allotments during 2002.
- Robbins submitted an incomplete Actual Use Report on July 15, 2002 for livestock use from 5/23/02 until 7/1/02 for Coulee-Mill Iron (#551) and Mill Iron-East (#582). Additionally, he submitted actual use on the Curtis allotment (#569) which is on advanced billing.

**** This actual livestock use during the 2002 grazing fee year was unauthorized because the Worland Field Office (WFO) had issued a Full Force and Effect and Emergency Closure decision (10/19/01) that was not stayed. Key forage species on those allotments associated with the HD grazing permit did not meet Range Readiness criteria set forth in the decision prior to grazing.

The reported grazing use did not comply with the grazing permit.

The WFO was instructed by WO in May 2002 that WO was working on a Settlement Agreement and that the WFO was to not respond to any unauthorized livestock grazing use.

- The Technical Assessment Team monitored resource conditions during October 2002. As a consequence, the authorized officer granted livestock use in allotment #'s 568, 569, and 584 during the winter of 2002.
- Robbins submitted an incomplete actual use report on Nov. 14, 2002. The AFM called Robbins for additional information so the WFO could generate a grazing bill. Robbins has never responded to the requested information.

NO livestock grazing use on the HD Ranch grazing permit was billed for or paid for during the 2002 grazing fee year.

WFO records suggest that about 3,388 AUMS (mostly unauthorized) were used on the HD grazing permit during the 2002 grazing fee year and were not paid.

High Island Ranch Grazing Permit

- Last grazing bill (#R390555) was issued February 20, 2002. Grazing bill contained livestock use in the West Cottonwood allotment (#535) from 2/20/02 until 2/28/02. Robbins paid the grazing fee charges (May 2002) on this bill but refused to pay the attached late fee. This grazing bill should have completed billings for the High Island Ranch grazing permit through February 28, 2002.
- The WFO did not issue a March 1, 2002 grazing bill for grazing use on allotments #'s 525, 596, 535, and 534. These allotments are on advanced billing. Use supervision reports stated livestock use did occur on these allotments during 2002.
- Robbins submitted an Actual Use Report on April 1, 2002 for livestock use from 2/20/02 until 3/28/02 for the East (#534) and West Cottonwood allotments (#535). Additionally, he submitted actual use on the Wagonhound allotment (#596) for 11/01/01 until 2/28/02.
- Robbins submitted an Actual Use Report on August 15, 2002 for livestock use on the East (#534) and West (#535) Cottonwood allotments from 2/20/02 until 5/15/02. On this same report, he submitted use on Wagonhound allotment (#596) from 5/1/02 until 6/18/02. Again, he is on advanced billing on these allotments.

**** This actual livestock use during the 2002 grazing fee year was unauthorized because the Worland Field Office (WFO) had issued a Full Force and Effect and Emergency Closure decision (10/19/01) that was not stayed. Key forage species on those allotments associated with the High Island grazing permit did not meet Range Readiness criteria set forth in the decision prior to grazing.

The reported grazing use did not comply with the grazing permit.

The WFO was instructed by WO in May 2002 that WO was working on a Settlement Agreement and that the WFO was to not respond to any unauthorized livestock grazing use.

- The Technical Assessment Team monitored resource conditions during October 2002. As a consequence, the authorized officer granted livestock use in allotment #'s 596, 535, and 534 during the winter of 2002. The AFM called Robbins for information so the WFO could generate a grazing bill. Robbins has never responded to the requested information.

NO livestock grazing use on the High Island Ranch grazing permit was billed for or paid for during the 2002 grazing fee year.

WFO records suggest that about 2,172 AUMS (mostly unauthorized) were used on the High Island grazing permit during the 2002 grazing fee year and were not paid.

Owl Creek Ranch Grazing Permit

- Allotment monitoring shows that some livestock grazing use has occurred during the 2002 grazing fee year on allotment #573 and #575. Allotment #573 and #575 are on actual use. No Actual Use report has been submitted. 560 and 227 AUMs are allocated on the permit for 573 and 575, respectively.
- Use Supervision coupled with a conversation between Frank Robbins and John Elliot (3/12/03) identified that 650 cattle will be on Coal Draw allotment (#574) from 2/19/03 until 4/1/03. Coal Draw allotment is on advanced billing. No WFO grazing authorization has been issued for livestock use with a change in season of use on this allotment. The grazing permit allocates 924 AUMs for allotment #574.

NO livestock grazing use on the Owl Creek Ranch grazing permit was billed for or paid for since issuance of the grazing permit on February 26, 2003.