

February 19, 2016

Bureau of Land Management
New Mexico State Office
301 Dinosaur Trail
Santa Fe, New Mexico 87508

Re: Parcel NM-201604-043 258.90 ACRES in Denton County, TX TX TR F-519; TR F-520A; TR F-520B; TR F-524.

Protest to the Inclusion of Parcel in the April 20, 2016 Competitive Oil and Gas Lease Sale

Dear Bureau of Land Management New Mexico, Oklahoma, Texas, and Kansas:

I'm a resident of Lewisville, Texas and I protest the lease sale because it has the potential to interfere with two of the primary purposes for which the reservoir was constructed: water supply and recreation. Drilling will also cause air pollution, endanger wildlife, and possibly destroy archeological artifacts.

Lake Lewisville is the primary source of my drinking water. Despite the stipulations in the sale notice and the mitigation requirements, accidents, malfunctions, and errors could occur. The risk of contamination from drilling near or under the lake is too great considering the number of people who would be affected, including me.

Unforeseen events, such as earthquakes, tornados, and lightning strikes could have damaging consequences to drilling operations and to our health as well. Lewisville Lake Dam is in disrepair and the risk of its failure is high. Repairs are still in the planning process. An Environmental Impact Statement on Lake Lewisville Dam has yet to be published. The Lewisville Dam Safety Modification Study Update in 11/2015 says that a draft will be available in September/Oct 2016 and the final report in Summer 2017. Up to date information is needed, especially considering the recent swarms of seismic activity in North Texas. Fracking and deep disposal of oil and gas production wastewater induce earthquakes.¹ The EIS report is likely to yield information related to the safety of drilling, especially a current analysis of the "geographic instability" of the area but the report will not be available by the time of the lease sale. Other unpredictable events have recently damaged North Texas drilling equipment and have caused health risks to nearby residents such as a lightning stike and a tornado. ^{2,3} Such events could damage equipment next to the lake as well.

In addition to the possible pollution of the water, any drilling operations will certainly further pollute the air. Denton County is currently in a non-attainment area for air quality because air pollution here exceeds the 8-hour ozone standards. Ozone rates are not improving. And monitoring of particulates has only recently begun in North Texas.⁴ Denton County ozone levels are among the worst in the US.⁵ There are no air quality monitors in some of the towns closest to the parcel like Corinth, Highland Village, Little Elm, Hickory Creek, or Lewisville and we rely on data from Denton and Flower Mound. Denton County's only monitor of particulate matter is in the City of Denton. Without closer monitoring it would be impossible to gather the data to estimate the safety of any oil and gas operations at Lake Lewisville.

I often go to the lake to enjoy the natural surroundings by walking and swimming there, and I want to continue to do so in a quiet and clean environment without the noise and smell of oil and gas drilling and diesel trucks. I've tried not to disturb the environment, though I'm tempted to pick some of the beautiful (and possibly rare) wildflowers that thrive by the lake. Honestly I've never seen a prairie chicken or peregrine falcon. I don't know one woodpecker from another. I'm even a little frightened of the gar fish.

But in Lewisville we don't have many places to interact with nature after a long commute home on a congested highway in level-orange air pollution. The proposed sale would make Sycamore Bend Park unusable and would eliminate part of the hiking trail from Sycamore Bend to the Old Alton Bridge. A planned equestrian trail to Sycamore Bend would be scrapped.⁶

Important artifacts are sometimes discovered around Lake Lewisville and are likely to exist under the parcel site. The Smithsonian Institution confirmed that artifacts found when the lake was created were from the Clovis people and were about 11,000 years old. After the lake was filled no further significant archaeological investigations took place except for revisiting the Clovis site during a time of drought and other surface investigation and "shovel tests." In 1990 an archaeological survey located a site, which the authors labeled 41DN444 that was investigated by two people who found some artifacts, but no further investigation took place.⁷ Last September, the remains of an American Indian was found on the northern shore of the lake.⁸ The Corps of Engineers took possession of the body and haven't disclosed further information about it. Also on the northern shore dinosaur fossils were found in January, 2013.⁹ And in 2011, 96 million year old crocodile bones (the oldest known crocodile) were found at Lakewood Village, which is close to the parcel.¹⁰ In light of the recent findings, a more thorough investigation is needed before drilling operations disrupt or destroy artifacts.

The possible hazards and damage to the area are not worth the potential revenue from drilling on this parcel.

Sincerely,

Tracy M. Kirk

¹Rubinstein, Justin L and Alireza Babaie Mahani. "Myths and Facts of Wastewater Injection, Hydraulic Fracturing, Enhanced Oil Recovery, and Induced Seismicity." Seismological Research Letters. (June 2015), 86(4):1060-1067. <

https://profile.usgs.gov/myscience/upload_folder/ci2015Jun1012005755600Induced_EQs_Review.pdf>

²Wilson, Sharon. "Lightning Strikes Denton Gas Well." TXSharon's Bluedaze.

<<http://www.texassharon.com/2015/05/08/lightning-strikes-denton-gas-well>>

³Triepke, Joseph. "Drilling Rig Takes Direct Hit from Tornado in Granite Wash Basin." OilPro.

<http://oilpro.com/post/13691/drilling-rig-takes-direct-hit-tornado-texas-3-injuries-reported-v>

4 Peggy Heinkel-Wolfe. "When a Breath is Hard to Catch." Denton Record-Chronicle. Aug 29, 2015. <<http://www.dentonrc.com/local-news/local-news-headlines/20150829-when-a-breath-is-hard-to-catch.ece>>

5Hopkins, Jamis Smith. "In Texas, Environmental Officials Align with Polluters." National Geographic. March 17, 2015. <<http://news.nationalgeographic.com/2015/03/20150317-ozone-air-pollution-clean-air-act-smog-texas-houston-dallas/>>

6 "Elm Fork Hiking and Equestrian Trail." US Army Corps of Engineers. <<http://www.swf-wc.usace.army.mil/lewisville/Recreation/Trails/Hike.aspl>>

7Lebo, Susan A., and Kenneth Lynn Brown. 1990 Archaeological Survey of the Lewisville Lake Shoreline, Denton County, Texas. Institute of Applied Sciences, University of North Texas, Denton. Submitted to US Army Corps of Engineers, Fort Worth District. Contract No. DACW63-86-C-0098. <<http://www.dtic.mil/dtic/tr/fulltext/u2/a285694.pdf>>.

8 "Investigator: Remains are from American Indian." Denton Record-Chronicle. Sept 29, 2015. <<http://www.dentonrc.com/local-news/local-news-headlines/20150929-investigator-remains-are-from-american-indian.ece>>

9 "Dino Discovery." Denton Record-Chronicle. Jan 01, 2013. <<http://www.dentonrc.com/local-news/local-news-headlines/20130127-dino-discovery.ece>>

10Adams, T. L., et al. 2011. "First occurrence of the long-snouted Crocodyliform Terminonaris (Pholidosauridae) from the Woodbine Formation (Cenomanian) of Texas." Journal of Vertebrate Paleontology. 31, 712-716.