

Amy Leuders
Bureau of Land Management
New Mexico State Office
P.O. Box 27115
Santa Fe, NM 87502-0115

February 17 2016

Re: Protest of April 20, 2016 Lease Sale

Dear MsLeuders

I am filing this Protest of the Bureau of Land Management's (BLM) planned April 20, 2016 oil and gas lease sale and Environmental Assessment DOI-BLM-NM-040-2015-61-EA, pursuant to 43 C.F.R. § 3120.1-3.

I formally protest the inclusion of the following parcel, NM- 201603-43 (also marked as MN-201603-44 on EA p. 17/101) covering a total of 258.9 acres on Lewisville Lake.

I am filing this protest on behalf of myself and my family. My name is Ann Webster and I live at 233 Greensprings St, Highland Village TX 75077 and I can be reached at 214-517-5762. My email is annhwebster@gmail.com.

I have young children and we live close to the lake and walk to it on a regular basis. Lake Lewisville provides our drinking water and I am worried about earthquake activity and pollution.

The reason I feel I am an affected party by the auction of the 10-year mineral lease on the property is due to the following [concerns]:

- My drinking water come from Lewisville Lake. Our city also has additional wells not far from Lewisville Lake. I am worried about the contamination of our drinking water through possible drilling runoff from the site. The possible migration of contaminants through our aquifers could also impair our public water wells.
- I am also concerned about the potential for increased seismicity from added drilling in and around Lake Lewisville. The Lewisville dam is currently under repair after a 161-foot long, 23-foot wide slide on an earthen embankment this past spring. Additional drilling or the migration of drilling fluids along existing fault areas below the lake could negatively impact the dam embankment or cause a breach. A major breach could put 430,000 residents downstream at risk of flooding and be a loss of our local water supply.
- The Environmental Assessment (EA) for this proposed lease sale is substantially and procedurally flawed. There was no analysis of how drilling, fracking, or wastewater injection could impact the Woodbine, Trinity or Paluxy aquifers in relation to this parcel. The EA does not address the soils

or the geology regarding this Lake Lewisville parcel along with other important issues.

Therefore, BLM's offer of this parcel is unlawful as it fails to sufficiently address the above issues as required by the National Environmental Protection Act (NEPA). Please pull this parcel from the April 20 auction. Do not put my family's water, health, and well-being at risk.

- AIR POLLUTION – Denton county is designated as “serious” as part of a 10-county nonattainment area for not having healthy air under the federal Clean Air Act. In early 2015, the EPA took public comments regarding elevating the 10-county DFW area to “severe.” Any drilling air emissions will only add to our unhealthy air quality.
- In DFW during summer months, the wind primarily blows from southeast to northwest any pollution could impact the Denton airport monitor, which has the worst air pollution readings consistently in our region.
- WATER POLLUTION – A 2015 peer-reviewed study by Dr. Zachariah Hildenbrand and others, “A Comprehensive Analysis of Groundwater Quality in the Barnett Shale” gives indications that fracking compounds have been detected in water samples near wells sites in an analysis of more than 500 samples in the Barnett shale. Some of this sampling was done in Denton county.
- SOIL/DAM IMPACTS– A 2013 presentation by Anita Branch of the Army Corps of Engineers identified new issues of concern in the relationship to dams and drilling. These issues include induced seismicity (earthquakes), the transmission of fracking fluids outside the target zone via natural faults underground, and the disposal of flowback water raising the potential for ground and surface water contamination. The presentation by the Corps further added that “[e]rosion of the embankment along existing faults located in the foundation, abutments or outlet works [that] could lead to project failure... [and] an uncontrolled loss of pool or flood storage.” In other words, a breach in a dam.
- WILDLIFE/MIGRATORY BIRDS – The whooping crane and the least interior tern are on the endangered species list and have been seen on Lewisville Lake
- CLIMATE CHANGE – The lifecycle of natural gas drilling heightens the effects of climate change. From the clearing of the well pad to drilling, fracking, storage and combustion, we do not need to add to this problem.
- Methane is 86 times more potent than carbon dioxide. It is a trigger for the creation of ozone- and is hazardous to human health.
- A July 2015 study, "Come Heat and High Water: Climate Risk in the Southeastern U.S." found that Texas will be one of the states most negatively impacted by climate change by mid-century absent any changes. The study forecasted more hot days, heat-related deaths, sea rise along Texas shoreline, and an annual storm damage increases of at least \$650 million due to increased storm related loss and damage along the Texas coast.

Sincerely,

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