



February 12, 2016

**Via fax (505-954-2010) and U.S. Mail**

Ms. Amy Leuders, Director  
Bureau of Land Management  
New Mexico State Office  
301 Dinosaur Trail  
Santa Fe, New Mexico 87508

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

Re: City of Irving's protest pursuant to 43 C.F.R. 3120.1-3 of proposed auction by Bureau of Land Management (BLM) of Parcel NM-201604-044 comprising approximately 259 acres in and adjacent to Lewisville Lake, Denton County, Texas

Dear Ms. Leuders:

The City of Irving was recently made aware that the BLM will be conducting an oil and gas competitive lease sale in Santa Fe, New Mexico on April 20, 2016, which will include the Lewisville Lake Property. Lewisville Lake plays a critical role in Irving's ability to supply a reliable and safe supply of water to over 220,000 residents and many key businesses. Irving contracts with the City of Dallas for the ability to temporarily store and convey our primary water supply that is pumped in from Jim Chapman Lake in Northeast Texas. Irving also purchases Lewisville Lake water from the City of Dallas as needed to fulfill customer demands.

Oil and gas production at the Lewisville Lake Property poses a significant risk to water quality. Any spills or releases of oil and gas waste and their hazardous components could run off into the lake and potentially impact drinking water quality. The direct impacts from oil and gas activities have not been adequately studied and represent an unacceptable level of risk.

The U.S. Army Corps of Engineers (Corps) acknowledged that the Lewisville Dam is "high risk". Risks to the integrity of the Lewisville Dam due to oil and gas production have not been adequately considered. The federally required Environmental Assessment prepared by the BLM in October 2015 fails to account for any public safety or environmental impacts related to dam safety of the Corps' known issues at Lewisville Lake.

The City of Irving did not receive any notice from the BLM or any other federal agency regarding this oil and gas competitive lease sale. We have not had an adequate opportunity to review and consider the potential impacts of the BLM auction of the Lewisville Lake Property.

Due to the importance of this water supply to our region, the potential serious impacts of oil and gas production adjacent to the lake and the lack of time to evaluate the proposal, we respectfully request that you withdraw the Lewisville Lake Property from the April 20, 2016 auction.

Additionally, we are aware of the formal protests filed by the City of Dallas Water Utilities and the City of Highland Village, Texas requesting a similar withdrawal; and, we are in full support of the respective protests sent to the BLM.

Please contact me if you have any questions regarding this letter or need additional information.

Sincerely,



Ramiro Lopez  
Assistant City Manager

cc: Chris Hillman, City Manager  
Michael Morrison, Deputy City Manager  
Todd Reck, Water Utilities Director