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attention to: Protest NM-201604-043 date: _____

company: Bureau of Land Management from: Andrew Clemens

phone #: 976-888-3345 company: SO/A

fax #: 505 954 2010 senders phone #: 940 366 3345

comments: _____

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To: Whom it may concern at

Bureau of Land Management
New Mexico State Office
301 Dinosaur Trail
Santa Fe, New Mexico 87508
Fax (505) 954-2010

I am writing to file a formal protest to the sale/lease of mineral rights for parcel NM-201604-043

I am a citizen, like many others, whose primary water supply is drawn from Lake Lewisville. Any action that could affect the water quality of Lake Lewisville will affect the water quality of the water I drink and bath in, affect the prices of the water I purchase, and the value of my property.

Lake Lewisville was built by the Army Corp of Engineers and its primary purpose is flood control and as a reservoir to provide water for the communities around it. The following cities use Lake Lewisville as a primary source of their water supply. This list does not include other communities that use the downstream flows from Lake Lewisville as a primary supply.

City	Est. Population (sources google, us census 2013)
Lewisville	101,074
Highland Village	15,747
Flower Mound	68,609
Hickory Creek	3,970
Corinth	20,618
Lake Dallas	7,337
Denton	123,099
Little Elm	32,701
Dallas	1,258,000
The Colony (buys up to 6 mil gal/day from Dallas)	39,458
Providence Village	5,750 (other sources)

From this list alone, the population of the communities that receive water directly from Lake Lewisville exceeds 1.6 million people.

Living in North Texas, I am familiar with the work of Oil and Gas companies to recover natural gas by 'fracking' from the Barnett Shale. I also always told myself that no one would be crazy enough to attempt to recover gas by 'fracking' under Lake Lewisville. The reason I believe that is because the risk reward relationship does not justify any attempt to recover gas from underneath the lake, and it certainly does not justify the federal government leasing mineral rights underneath the lake.

Risk / Reward is simple calculation, one that people who go into casinos ignore every day. In this case there is a small but non-zero chance that in attempting to recover natural gas from under Lake Lewisville the actions of a drilling company could contaminate a primary water supply for more than 1.6 million people, and to also contaminate water supplies for everyone downstream also. If the contamination were severe enough to render the water unusable, which is also a small but non-zero chance of, a contamination event would create a disaster of epic proportions, which would send communities scrambling for months and perhaps years to establish water supplies from new and existing sources

while the people of all these communities would suffer from a reduced supply of water in that time period.

In Texas drilling for natural gas has spurred investigations from major news sources and universities, such as WFAA and the University of Texas at Arlington which have shown evidence of contamination of ground water sources due to drilling and improper sealing of well bores.

<http://www.wfaa.com/news/local/investigates/rules-ignored-water-fouled-in-barnett-shale/38337835>

Research on hydraulic fracturing provided by the University of Ohio indicates a number of ways that seepage causing surface water contamination can occur, including seepage through improperly sealed wellbores, seepage through abandoned wells, and seepage through natural fracture networks.

<https://news.osu.edu/news/2014/09/15/gas-leaks-from-faulty-wells-linked-to-contamination-in-some-groundwater/>

I don't believe that any responsible large corporation (or even one that has significant assets at risk) would be willing to take the risk of "Fracking" under a reservoir that so many people depend upon, for the mere gain of the natural gas found in 258 acres of land. I also don't believe the amount of revenue generated for the federal government by leasing this land makes it worth it either.

Therefore I protest this inclusion of this parcel in the group of parcels to be included in the auction of mineral rights and request that this parcel be withdrawn because

- 1- The non-zero amount of risk to the water in the Lake Lewisville reservoir interferes with the Lake's primary usage as a reservoir to the local communities.
- 2- The public safety impact of significantly contaminating Lake Lewisville is so severe even with miniscule probabilities of contamination occurring, the monies gained from extracting natural gas from this small amount of land are far offset by the regional amount of damage that could potentially occur.

While it is my request and my preference that the Bureau of Land Management completely withdraw this parcel from the mineral rights sale, if they do decide to go ahead with the sale, I am requesting that additional stipulations to the sale to protect the people in communities around Lake Lewisville and of the United States from being adversely affected by any contamination as a result of the drilling.

The first stipulation requested is that if hydraulic fracturing is allowed, that trackable trace elements be required to be added to mix of water and chemicals used to do the fracturing. In the case of water contamination these trace elements would serve to put an end to "insufficient evidence" and to prove if contamination was a result of a particular drilling or fracking operation, both in Lake Lewisville and in the Trinity Aquifer. See the article at <http://www.texastribune.org/2015/04/24/justices-prolong-high-profile-fracking-battle/> for an example of denial of responsibility of a drilling company in Texas.

The second stipulation requested is that any company leasing mineral rights for this parcel have more than 3 billion dollars in assets. This is to ensure that if there is a case of significant contamination that the company will have the assets available to pay for the damages caused by the contamination and for restoration the Lake Lewisville reservoir to its original condition.

In summary, the finding of no public safety impact for an oil and gas lease for this parcel of land did not adequately assess the impact of low probability contamination events on the large population served by this reservoir. Also, this lease should not be offered because any amount of risk of contamination of Lake Lewisville would be contrary to the Army Corp of Engineer's primary purpose for Lake Lewisville to serve as a water reservoir for the communities around it.

Thank you for your consideration of this protest.

Sincerely,

Andrew Clemens
704 Lake Bridge Dr.
Lake Dallas, TX 75065