

February 6, 2016

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

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STAFF OFFICE  
SANTA FE, NEW MEXICO

Dear Bureau of Land Management,

Statement of Intent: Under regulation Title 43 CFR 3120.1-3, I am writing to protest the inclusion of the following Lewisville Lake (TX) parcel in the New Mexico, Oklahoma, Texas, & Kansas Competitive Oil & Gas Lease Sale notice for April 20, 2016:

DOCKET #  
"NM-201604-043" 258.90 Acres  
TX TR F-519;  
TR F-520A;  
TR F-520B;  
TR F-524;  
Denton County  
Tulsa FO  
CORP OF ENGINEERS  
LAKE LEWISVILLE PROJECT  
NO PRIOR LEASES  
Stipulations:  
COE-NSO-LEWISVILLE LAKE  
ORA-2: Wetland/Riparian Protection Stipulation  
WO-ESA-7: Threatened and Endangered Species Stipulation  
WO-NHPA: Cultural Resources Stipulation  
Number of Parcels – 43  
Total Acreage – 36841.03"

Statement of Interest of Protesting Party in this matter: I am a resident of Denton, Texas, and mother of two young children. I am interested in this matter because my city (and therefore my family) gets its drinking water supply from Lewisville Lake. I do not want to risk the health of my children and my community so that a dying industry can profit by injecting toxic chemicals into our drinking water supply.

Statement of Reasons:

1. The sale of this land might be perfectly legal, but the inevitable effects would be criminal. Michael Moore recently said of the Flint Michigan water crisis: "There is not a terrorist organization on Earth that has yet to figure out how to poison 100,000 people every day for two years." And yet that is exactly what's been happening in Flint, and could very likely happen in Denton, Dallas, Flower Mound,

and much of the North Texas region if BLM's April 20th auctioning of mineral rights under Lewisville Lake goes ahead as planned. Lewisville Lake is the main source of drinking water for the residents of Denton, Dallas, and the surrounding cities of North Texas. Lewisville Lake also includes Lake Dallas and Grapevine Lake; it's all one big lake that serves as the primary drinking water reservoir for the entire North Texas region. If the mineral rights under Lake Lewisville are sold for fracking, then the combination of aggressive drilling and toxic chemicals could poison the entire drinking water supply for all of North Texas. It would be a disaster of apocalyptic proportions here in North Texas that no terrorist organization could successfully mastermind. Our federal government takes great measures to protect citizens from terrorism. Shouldn't you, as a body of that federal government, be doing your part to protect hundreds of thousands of North Texans from a potential mass-poisoning epidemic as well?

2. Fracking this vulnerable underwater area would devastate the recently flooded Lewisville Lake dams and cause earthquakes of unknown magnitude.
3. There are at least 2 strong economic arguments to be made against the sale of this public land for drilling: Economic Reason (A): Revenues from the land lease and the royalties (12.5% split between the federal and state governments) will hardly be enough to remediate any damages done in the process of exploration and production, leaving taxpayers to foot the bill for repairing such damages to our public property.
4. Economic Reason (B): The current market rate for natural gas is only about 25% of production cost, so no profits will accrue from allowing production adjacent to a major public water supply.
5. Finally, the sale and fracking of this property for fracking would violate basic human rights to clean drinking water and is therefore is not a matter of "commercial reasonability" per HB40 (last year's controversial statewide ban on bans). When commercial interest interferes with Texas citizens' basic right to drinkable water, the human rights issue trumps the commercial interest issue, even under HB40. There is no way to drill and inject hazardous chemicals directly underneath an open public water source without poisoning the water and the people who derive their drinking water from Lewisville Lake and the attached lakes. There is no safe way to frack underneath an open public water supply of this scale. It is inevitable that the water would be adversely affected, and that North Texas and the BLM would have a Flint Michigan type situation of even greater magnitude on their hands.

With all of the above in mind, the BLM should be taking greater measures than ever before to protect American children's and families' precious drinking water supply from becoming poisoned. The health risks in this particular case are just too great, and the stakes much too high. It is up to BLM now to choose to either (A) avert an even bigger Flint-Michigan type water crisis in North Texas, or (B) be the cause of it. It is an easy choice to make. I trust that you will do the right thing.

Sincerely,



Deborah Needleman Armintor

2003 Mistywood Lane

Denton, Texas 76209