

2016 FEB 19 PM 12:47

February 15, 2016

Re: Protest of April 20, 2016 Lease Sale of the "Lewisville Lake" Property NM-201603-43

Dear Ms. Leuders and Ms. Serrano:

I am filing this Protest of the Bureau of Land Management's (BLM) planned April 21, 2016 oil and gas lease sale and Environmental Assessment DOI-BLM-NM-040-2015-61-EA, pursuant to 43 C.F.R. Section 3120.1-3. I formally protest the inclusion of the following parcel NM-201603-43, covering 258.9 acres on/adjacent to Lake Lewisville.

My name is Charles W. Beall and I live at 3 Texoma Court, Hickory Creek, TX 75065. I can be reached at chuck@cwbeall.com, (770) 853-4767.

I am an affected party by the auction of the 10-year mineral lease on the property because:

- 1) I live in Hickory Creek, Texas. The Town of Hickory Creek obtains its drinking water from Lake Lewisville and public water wells near the lake. I am deeply concerned about the contamination of our drinking water through possible drilling runoff from the site. The possible migration of pollutants through our water wells could also contaminate our public water wells. 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 near well sites in water sampling done in Denton county and other areas of the Barnett shale.
- 2) I am also concerned about the potential for increased seismic activity from added drilling in and around Lake Lewisville. The Lewisville Dam is currently under repair after a 161 foot by 23 foot slide on an earthen embankment this past spring. There are currently three additional areas of seepage being monitored by the United States Army Corp of Engineers. Additional drilling or the migration of drilling fluids along existing fault areas below the lake could negatively impact the integrity of the dam's infrastructure. The Lewisville Dam has been listed as the eighth most hazardous dam in the country. The U.S. Army Corp of Engineers has stated that the Lake Lewisville Dam is in urgent need of repair and classified it as a very high-risk dam. The Corps assessment does not take into account the tragic consequences of a dam failure which would include: loss of lives

downstream in addition to disastrous economic and environmental impact on downstream communities such as Carrollton, Coppell, Farmers Branch and Dallas. A 2013 presentation by US Army Corps Engineer, Anita Branch identified issues of concern in the relationship of dams and drilling. The issues include induced seismicity (earthquakes), the transmission of fracking fluids outside the target zone via natural faults underground, and the disposal of flow-back water raising the potential for ground and surface water contamination. Ms. Branch also pointed out that gas drilling was not considered in the design of the dams.

- 3) I live in close proximity to Lake Lewisville and would be adversely affected by any odors or other pollutant effects caused by drilling and fracking.
- 4) I am worried about potential contaminants in parks at Lake Lewisville. I would like to continue to enjoy picnics and other activities at parks on the lake, and I don't want oil and gas residue from spills or contaminants from hydraulic fracking in the lake or on the shoreline.
- 5) I am concerned about the potential impact on home sales in my neighborhood as well as the impact on my local economy should this parcel become contaminated. My home value would fall. Why risk contaminating our lake, our shoreline, our parks, the water supply for over two million people by drilling here? There are other properties that are less risky, less hazardous.
- 6) Denton County air quality is currently designated as "serious" with regard to not having healthy air under the federal Clean Air Act. In 2015, the EPA took public comments regarding elevating the entire 10-county DFW area to "severe." Any drilling air emissions will only add to our unhealthy air quality.
- 7) 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 our water, health, and well-being at risk.

Sincerely,



Charles W. Beall, Ph.D.
3 Texoma Court
Hickory Creek, Texas 75065

cc: Congressman Burgess
Senator Jane Nelson
State Representative Tan Parker
State Representative Ron Simmons