

TERRY RICH

August 5, 2014

Jesse Juen  
U.S. Bureau of Land Management  
New Mexico State Office  
PO Box 27115  
Santa Fe, New Mexico 87502

Re: Offering of Public Lands for lease (NM-2014-001, 004 through 015)

Dear Director Juen:

My name is Terry Rich and I live in Abiquiu, just a short walk to the Rio Chama. Our well — and our health—are dependent on the flow and purity of the river. I have studied the most recent (July 18, 2014) Environmental Assessment (EA) for the October 22, 2014 Oil and Gas Lease Sale and I strongly believe that a finding of No Significant Impact (FONSI) is not supported. Here is why:

**STATEMENT OF REASONS**

The parcels cited above are on the eastern slope of the Continental Divide. Most of the EA concerns the geology and hydrology of the Mancos Shale target area in San Juan County. The only mention of water sources on the Eastern slope are on page 39:

"Additional Information on water resources in the Forest Service Parcels is contained in the FEIS for Oil and Gas Leasing and Roads Management, Santa Fe National Forest 2008 (page 76-84)."

This is the only mention of the the hydrology east of the divide and yet this is the exact area where the BLM proposes to lease the parcels cited above. They are not in the San Juan Basin and the underlying rock and ground water features are very different because of glaciation.

In the FEIS, the U.S. Forest Service considers three alternatives based on site-specific Best Management Practices (BMPs). Under Alternative 1 — No Action — the Forest Plan would not be amended and oil-gas leases would continue to be issued under standard terms and conditions. Under Alternative 2, the Forest Plan would need to be amended so that potentially undesirable locations for well sites and other facilities would be avoided through NSO and CSU lease stipulations. The NSO stipulation precludes surface occupancy unless and until such activity is specifically approved by the Forest Service. Regardless, according to the FEIS (page 84), "There would be no difference in the potential for impacts to ground water resources under this alternative, compared to Alternative 1." Under Alternative 3, the Forest Plan would also require amending. Surface water quality could be least affected because it prohibits development on 4,000 additional acres.

The FEIS concludes:

"Alternative 1 could have the greatest potential to affect surface water quality because it would provide the least protection for sensitive resources from oil-gas development if wells on new leases were developed in the future."

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and:

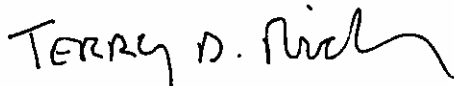
"Ground water quality is not likely to be affected by Forest Service actions, but may be adversely affected by other activities in the region, such as drilling of domestic wells and oil-gas development."

The BLM assessment of water resources in the area that comprises the upper Rio Chama Watershed is entirely reliant on a Forest Service study that concludes that oil-gas development may affect both surface and groundwater quality. Does the EA address this critical issue that could affect the health and livelihood of thousands of people downriver? No, it emphatically does not.

The assessment does not even mention the unique geology and hydrology that affects surface and groundwater flows under and east of the parcels cited above. Striking differences in geology and production east and west of the Continental Divide are attributable to glaciation and the flushing of Mancos shale with melt. Here on the Eastern Slope, the Mancos shale overlies the groundwater. Injecting contaminated fracking fluids and produced water directly above drinking water is banned by the EPA.

There is simply not enough information for any risk assessment or FONSI. Going ahead with the lease sales and drilling could violate Federal law.

Respectfully,



Terry Rich  
PO Box 1005  
Abiquiu, NM 87510