

Jesse Juen
U.S. Bureau of Land Management
New Mexico State Office
PO Box 27115
Santa Fe, New Mexico 87502
Telefax: 505-954-2010

August 13, 2014

Dear Director Juen:

I am writing on behalf of the Rio Arriba Community Health Council, a coalition of health and human services and related providers serving the residents of Rio Arriba County. Our member agencies include all the clinics and hospitals serving Rio Arriba, as well as schools, religious organizations, economic development agencies, businesses, law enforcement and other entities. We are writing to express our serious concern to our watershed and health stemming from your proposal to include the 13 parcels in the Santa Fe National Forest that are up for lease sale in the October 22, 2014 Oil and Gas Lease Sale/Farmington Field Office. These parcels are: NM-201410-001, 004, 005, 006, 007, 008, 009, 010, 011, 012, 013, 014, and 015. We are demanding that these remaining parcels, east of the Continental Divide, be deferred for the same reasons that the other 22 parcels were deferred, as they are in the same geologic and geographic location.

Water is essential to the health of our residents, our economy and our agricultural way of life. We ask you to defer due to until all necessary environmental studies can be completed and all regulatory procedures followed. We ask the BLM to update their 2003 Resource Management Plan (RMP) and Mancos Shale/Gallup formation RMPA/EIS alternatives. These two studies do not currently address shallow shale hydraulic fracturing (fracking). If the lease sale continues, BLM will be in violation of the National Environmental Policy Act (NEPA). Our community cannot tolerate risks posed by inadequately examined fracturing procedures to our water.

Millions of gallons of water are required for each proposed well, and oil and gas companies will want to use our water for industrial purposes. Fracking risks poisoning our water and that of millions of downstream users. Insult to our water supply threatens the health of our residents, as well as the viability of our farms. Moreover, we are very concerned that removal of our watershed from agricultural use might lead to its classification as a commodity to be sold for profit by the same industries that are now proposing their test of fracking.

Oil and gas companies are not legally required to disclose the chemicals they inject into the wells. In 2011 the House of Representatives reported that of 2,500 fracking

products, 650 contain known carcinogens. Spills in New Mexico's oil and gas fields set records in 2012, with nearly 700 self-reported accidents. At least thirty reported spills during 2011 and 2012 impacted a waterway or a groundwater supply. Toxic waste-water will be produced by the millions of gallons through the proposed practice, and there is no reference in the BLM Assessment to how wastewater will be removed or remediated.

There are several known fault lines near the Abiquiu reservoir. Injection wells are often used to dispose of waste-water, and these are known to cause seismic activity. We are concerned about the impact of seismic activity on our community, and on the pristine waters harbored in Abiquiu.

Flaring is a common practice used in fracking in which huge amounts of hydrocarbons are released directly into the atmosphere. As we noted in *Salud de Arriba!*, our county health profile, childhood asthma is prevalent in northern Rio Arriba. Flaring has the potential to exacerbate this already identified problem. Flaring also poses an extreme fire danger in our Santa Fe National Forest. A 3-12 mile radius has been identified as dangerous to human and animal health. Waste-water pits are another means of disposing of the toxic sludge. These are often open and potentially improperly lined pits that are filled with waste-water and left to evaporate.

In this high desert climate the soil can be fragile. The Rio Arriba Community Health Council has prioritized agriculture and our local food market as essential for a healthy economy. Our children suffer diabetes at three times the rate of surrounding counties, and one proven method of remediating this health risk is to encourage a return to the local traditional diet. Small farms and gardens are essential to our community as they feed families, bring in extra income, and encourage healthy outdoor activity while building social ties. Farming is a traditional activity in our county. Destruction of soil due to erosion from heavy truck traffic, construction of drilling pads, and toxic chemical spills threaten the existence of our farms, and thus our culture. Frankly, farming/gardening is our most important after-school activity for children, and our safest. We do not want to see this change.

Many Rio Arriba families supplement their food supply through subsistence hunting. Hunting and grazing are important sources of healthy protein for our community, and also an important economic resource.

Quoting from your Environmental Assessment:

"Environmental justice refers to the fair treatment and meaningful involvement of people of all races, cultures, and incomes with respect to the development, implementation, and enforcement of environmental laws, regulations, programs, and policies. It focuses on environmental hazards and human health to avoid disproportionately high and adverse human health of environmental effects on minority and low-income populations."

We demand that you honor this passage, insuring a healthy environment for the diverse cultures living in Rio Arriba County. These include three Native American reservations, and a 70% Hispanic population.

In closing, we demand that you defer the remaining 13 parcels in this Lease Sale. The BLM Farmington Field Office has the authority, as the sale agent, to defer these remaining parcels. These 13 parcels in the Santa Fe National Forest pose the same issues as their neighboring parcels that have been deferred and the same risks to the Rio Chama Watershed east of the Continental Divide.

A finding of No Significant Impact (FONSI) for the October 22, 2014 Oil and Gas Lease Sale is not adequately supported by the Environmental Assessment as it now stands.

Sincerely:

**Lore Pease, RACHC President
1122 Industrial Park Road
lpease@ecfn.org**

!!!EL AGUA ES LA VIDA!!!

WATER IS LIFE

RACHC Member Agencies:

**Rio Arriba County
City of Española
Española Presbyterian Hospital
El Centro Family Health
Española Police Department
Española Public Schools
La Clinica del Pueblo de Tierra Amarilla
Rio Arriba Concerned Citizens
St. Vincent Hospital
United Way of Los Alamos and Rio Arriba Counties
CASA**

Valle del Sol
YMCA Teen Technology Center
Hoy Recovery Program
Siete del Norte
Española Chamber of Commerce
Las Clinicas del Norte
NCCBS
Rio Arriba Senior Programs
Rio Arriba Health and Human Services Department
Las Cumbres Community Services
La Tierra Montessori School
Presbyterian Medical Services
Interfaith Leap
The Lifelink
Santa Fe Civic Housing Authority
Lovelace Research Institute
SL Start
CYFD
NM Department of Health
Inside Out
Santa Fe Recovery Program
Rio Arriba Sheriff's Office
Moving Arts Española
Española Community Theater
Local Collaborative 1
Rio Arriba Youth Service Providers