

①

**Protest of Remaining Undeferred Parcels in BLM's
Lease Sale Proposal for October 22, 2014
Including
All Parcels Previously Proposed East of the Continental Divide
in**

(EA Log Number: DOI-BLM-NM-F010-2014-0154-EA)

A protest by an individual resident of New Mexico:
Jackie Woolston, PO Box 619, Canjilon, NM. 87515
575-684-0148

To ALL concerned parties with special:

**Attn: Jesse Juen, NM BLM State Director
301 Dinosaur Trail
PO Box 27115
Santa Fe, NM 87508**

INTEREST:

My interest in this protest is that the BLM has tried to lease and develop oil and gas parcels within miles of my home in the very recent past, and in looking into the many problems with BLM's allegations, I realized that others' health and property values in the Rios Chama and Gallina Watersheds are being similarly threatened by misrepresentations about the safety of oil and gas development and about the geology, hydrology, seismology, tectonics, glaciation, agriculture, and other resource uses in these Watersheds on the Chama Platform when compared by BLM to those of the San Juan Basin. The BLM equates its declared basin with our Watersheds, and they are distinctly different in virtually every aspect, especially when it pertains to community health. There scoping provided information about San Juan Basin which has no bearing on virtually all aspects of reality in our Watersheds.

Even the mere consideration of oil and gas development in the October 2014 BLM Lease Sale for Parcels NM-201410-001, NM-201410-002, NM-201410-003, NM-201410-004, NM-201410-005, NM-201410-006, NM-201410-007, NM-201410-008, NM-201410-009, NM-201410-010, NM-201410-011, NM-201410-012, NM-201410-013, NM201410-014, and Parcel NM-201410-015, appears to be approaching criminal callous disregard to ALL persons health and welfare in OUR Watersheds, especially those in the immediate vicinity of the Parcels, and all those downstream from Abiquiu Dam to the Gulf of Mexico. BLM sought to actively limit the scope of those scoped in its scoping of the proposed leases, when it affects everyone downstream and downwind. BLM apparently didn't even post the scoping and comment period in the post offices,

which is a matter of Environmental Justice, and its voluminous downloads were an abuse of net neutrality. It was nearly impossible for someone living in the vicinity of the proposed parcels to have found the information on BLM's web site, to download all the documentation, to verify all the allegations many of which are untrue, and to respond to the scoping with comments even if they had an internet connection, especially if they had only a dial up connection. A two week internet scoping was tantamount to no scoping whatsoever for many of those affected by the leasing of these parcels. Spanish is a recognized language in the state of New Mexico. Talk about Environmental Justice, Spanish is the first language of many homes in Rio Arriba County. I have yet to see one Spanish translator at any BLM functions, need I remind you that New Mexico's State Constitution recognizes Spanish and IS a dual language state.

Gas and oil development East of the Continental Divide with most of the remaining parcels being in the Santa Fe National Forest along the Nacimiento Fault on top of near vertical formation outcropping that serve as aquifer recharge within the Rio Puerco (de Chama) and Rio Gallina Tributaries of the Rio Chama/Rio Grande, is tantamount to intentional poisoning of our native groundwater AND MILLIONS OF PEOPLE DOWN STREAM.

The OSE Technical Report by John R. Erickson illustrates the faulted and fractured nature of the Madera Limestone, and probably most other strata within the Chama Platform resulting from the Nacimiento Uplift, other tectonic events, and perhaps even the repeated heavy glaciation that the watersheds have endured. Tracking tracers of Fluorescein and Salt from Sink Hole to Poleo Canyon Spring also speaks to both, the intermittent stream flows to the East of the Nacimiento Uplift/Fault and the resulting streams that together are tributaries to the Rios Gallina, Puerco (de Chama), and Chama Watersheds, Lake Abiquiu, and eventually the Rio Grande (and Compact). The communication between the formations is both obvious and extensive, as is well documented with such extensive vertical faulting. Oil and gas development on top of an extensive fault zone above and surrounding an Earthen Dam which has already experienced earthquakes in 2010(?)...is NOT a good idea! Trinidad...Anyone?

Between the Continental Divide and the faulting associated with the Nacimiento Uplift (all still East of the Continental Divide) near vertical strata helps recharge the OSE-DECLARED Upper Rio Grand Groundwater Basin ...operative word...Rio Grande. "Rio Grande Compact" ring any bells? Existing gas and oil development (OCD) in these same Township and Ranges for the remaining proposed lease parcels demonstrates well depths directly into the drinking-water-bearing strata. While disdain for water quality in these formations is understandable for the San Juan Basin, such "dis'regard" for drinking water supplies in the Rios Gallina, Puerco (de Chama), and Chama Watersheds is unfounded. Groundwater in the San Juan Basin, for example the Morrison Formation is reportedly salty, especially with all the brine well injections from by the oil and gas

industry! The Dakota Sandstone, Morrison Formation, Entrada Sandstone, contributing Chinle Group and Cutler Formation, and the Madera Limestone are not salty in the Rios Gallina, Puerco (de Chama), and Chama Watersheds. The cause for this distinction between salinity of the San Juan Basin while the Rio Chama platform has drinking-water-quality groundwater is likely the obvious repeated glaciation that the latter has undergone.

Your FONSI appears to be misinformed or at least very-poorly researched, and is for an area admittedly outside your primary study area (2001 RFD), and the National Forest is responsible primarily for surface water, even when the river runs underground. The forest service's concerns mainly for erosion and silting contamination of surface water appears to largely ignore the potential contamination of "surface" spring water by groundwater that has been contaminated by oil and gas exploration.

For example injecting ACID from flowback and produced water into Greenhorn and eventually Madera Limestone constitutes no long-term confinement of these toxic and carcinogenic wastes. Acid dissolves limestone, especially with extensive vertical faulting in naturally occurring, already fractured formations. Since even the Madera Limestone outcrops just above Lake Abiquiu, surface and groundwater contamination WILL eventually run downstream, contaminating the drinking and irrigation water supplies for millions of people downstream. The highly faulted recharge geology with documented easterly outcroppings of most, if not all of the targeted formations in the proposed lease parcels right down to the Madera Limestone (a large fresh water aquifer feeding into Abiquiu Dam) leaves virtually NO protective confining layers for the drinking-water-bearing formations. According to the EPA concerns already expressed in their 2012 progress report, vertical recharge and communication between strata are major concerns with hydraulic fracturing operations in shale plays.

Oil and gas development with subsequent fracking into groundwater and surface tributaries of a Rio Grande Compact (100% allocated) river that runs onto and across and probably recharges an EPA-designated and protected Sole Source Aquifer...the Espanola Aquifer...requires EPA involvement.

BLM, and its retirement programs, are probably Federally funded, and I bet most gas and oil developers receive some sort of Federal subsidies.

Not all geological formations are created equal. The Rios Gallina and Puerco Watersheds in question have undergone extensive shifting, uplifting, folding and faulting & fracturing from repeated tectonic events, and subsequent repeated crushing glaciation and melt run-off. The Rios Gallina and Puerco is textbook for intermittent "surface" stream flows..the recharge and stream flow both dipping under the fractured and alluvial surface only to resurface and flow into springs, streams, rivers, reservoirs, and lakes

below! The burden of proof is on the BLM, with flat out lies in the Rio Grand Sun article from the past February by Dave Evans...ie..."the Mancos Shale sits only a couple thousand feet below the surface" "And their (Cebolla's) groundwater sits right on top of it". I am aware of no retraction of these fabrications. Mancos Shale and the El Pedro soil derived therefrom IS the surface in much of the Rio Chama Watershed, and even parts of the Rio Gallina Watershed, making it nearly impossible to believe or trust BLM's FONSI has any factual basis! Groundwater protection by well casing is not even an option when injecting directly into seasonal fresh-water-bearing formations and historic (Legacy) and current drinking water wells. ARE the targeted strata OR the targeted formations directly above or into the aquifer in highly faulted and fractured strata?...How does WELL CASING protect that when it is shooting out the end of the casing directly into the drinking water supply? These water bearing formations DO provide much needed native water into the Rio Grande by way of the Rios Puerco (including Chama), Rios Gallina and Chama watersheds, outcroppings, springs, and stream flows. Release of Uranium present in virtually all of the affected formations below the Mancos Shale with injected oxygen and acid has been shown to dramatically increase contamination of groundwater with this and other radioisotopes, like Radon and Radium. Even neutron well-logging in the drilling and production phases of exploration into formations containing fertile 238-Uranium raises concerns for nascent 239-Plutonium contamination, along with a host of other extremely toxic and carcinogenic radioactive contaminants that can be generated in the subsurface. By the way, where are you disposing of the filter socks...the "radioactive" filter socks that you claim retain all the radioisotopes from oil and gas exploration/production? You know, the ones that landfills can't take. How do the drilling tailings into radioisotope hang onto released radon? How do you trap the released radon when nitrogen is flared in the National Forest? Who does your geology and environmental research and health risk assessments? Has the DOI-BLM-NM been infiltrated by oil and gas sycophants?

Jesus is said to have turned drinking water into "wine", it would appear that y'all are hell bent on turning fresh drinking water into "BRINE"!...Cheney is NO Jesus and Poison IS Poison no matter how many "LOOPHOLES" there are to hide behind. When you or someone you love is enjoying cancer or some other horror from environmental toxins, please remember your contribution to their agony! My father died an agonizing death due to environmental toxins...working with GMO sugar beets. He was told it was SAFE even though it killed mounds of bats around the plant! RING ANY BELLS of the "ALARM" variety!

The reported cost to clean up a single Superfund Site for a dry cleaners is \$15,000,000 to \$20,000,000 in Espanola above the EPA-Declared and Protected Espanol Sole ("SOUL") Source Aquifer. I would venture to guess this is nothing compared to the cost of "trying" to clean up an entire Watersheds, if it can be done at all. Oops! There goes all of the County's and States' profits from gas and oil, and maybe BLM's, since the Oil and Gas Industry is above the law and responsibility for its actions, which includes dumping

the costs of cleanup on the backs of the tax payers...You know, the people who were lied to and poisoned by BLM's FONSI decisions? Who pays the health care costs, including those associated with accumulated exposures from so-called SAFE, neurotoxic and carcinogenic fracking fluid chemicals? Does the Affordable Health Care Act that most Americans can't afford cover this? I am not certain what fairy tale world gas and oil proponents live in, but drinking, bathing, irrigating with, and breathing the carcinogenic, toxic, and radioactive chemicals in fracking fluids and flowback and produced water WILL have horrendous consequences for millions of people down stream. There are NOT just 10, allegedly relatively benevolent, chemicals used in fracking fluids. THERE ARE HUNDREDS, and more likely THOUSANDS of chemicals used, as documented by the EPA, including extremely TOXIC and CARCINOGENIC and RADIOACTIVE ones.

Please consider wisely. Names of responsible parties are being compiled.

Sincerely,

Jackie Woolston

Resident, stakeholder and carbon-based life form REQUIRING CLEAN air, food, and DRINKING WATER...just as you and your children and millions of people downstream do.

The sins of the Fathers **are** visited upon the Children. There will be a day of reckoning, what goes up does come down and undoubtedly WHAT GOES DOWN WILL COME UP. For every action there is an equal and opposite reaction. --A LAW of physics.

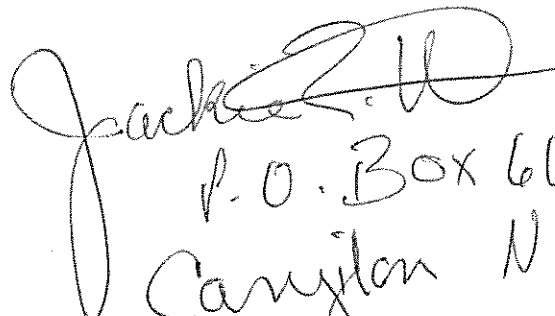
PS.

The argument, that everyone uses petroleum products, so oil and gas development is driven by demand, is true enough, but when one considers that the ENTIRE oil and gas industry is based upon a myriad of blatant LIES about its SAFETY to the environment and OUR HEALTH...it is clear the TRUTH should have been the foundation of energy development, for then we would be using more SOLAR, WIND, HYDROGEN and OTHER SAFE, YET GROSSLY UNDER-RATED AND UNDEVELOPED RESOURCES.

Is it a predetermined agenda of the BLM to contaminate the last drop of drinking water, or is their primary goal to protect groundwater and surface water?...Some places are best left alone!

Please stop oil and gas development in the Santa Fe National Forest,
essentially THE major tributary to Rio Grande Watershed and its
surface and groundwater tributaries: Rio Chama, Rios Puerco
(including Chama), and Rio Gallina Watersheds!

Again,
Sincerely,
Jackie


P.O. Box 619
Canyon NM
87515

To Whom it May Concern,

The Bureau of Land Management, located at 301 Dinosaur Trail, Santa Fe, NM 87002 has received 2
letters of protest from:

Jackie Woolston ^① P.O. Box 619 Canjilon NM 87575

Signed and accepted by M. Williams 15 Aug 14
Date

Stuart Berger ^②