

Elena Alcantara  
4095 Rosenda Ct. #253  
San Diego, CA 92122

To whom it may concern:

I hereby submit this letter of protest in accordance with 43 C.F.R. 3120.1-3. I am writing to protest the Bureau of Land Management ("BLM") planned offering of 15 parcels containing 17,645.94 acres of federal lands in Fresno, Monterey, and San Benito counties, California.

My interest in the matter is related to the considerable potential for negative impact on the local environment. I am a native Californian and intend to remain so for as long as I live. My primary concern regarding hydraulic fracturing in California is that "fracking" has already been associated with increased seismic activity in the Dallas-Fort Worth area. In an area which had never previously experienced earthquakes, they are becoming a regular part of life. What impact might this practice have in an area which already has a substantial amount of tectonic instability such as California?

Our secondary concern is the harsh chemicals involved in the process. While many companies have not released their secret recipe, fracking fluids are known to contain many carcinogens which have in some cases entered into the ground water. These wells will be in very close proximity to California's extremely vibrant and profitable "fruit basket" in the central valley. I shudder to think what might happen should these fracking fluids contaminate the ground water in such an important agricultural area.

In closing, I urge you to remember the reason for the creation of the BLM itself. The BLM's stated mission is to sustain the health, diversity and productivity of the public lands for the use and enjoyment of present and future generations. California's natural beauty is something we won't be able to get back.

Thank you for your consideration of this letter.

Sincerely,

Elena Alcantara

Andrea Contreras  
1203 Melrose Ave.  
Chula Vista, CA 91911

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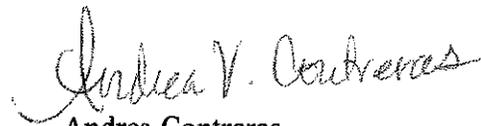
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Andrea Contreras

Drew Gilinsky  
4095 Rosenda Ct. #253  
San Diego, CA 92122

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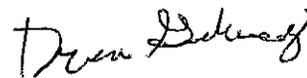
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Sincerely,



Drew Gilinsky

Donna Kaufman  
1261Harcourt Ave  
seaside, CA 93955

BLM  
California State Office  
2800 Cottage Way W1623  
Sacramento, CA 95825  
Fax 1.916.978.4388  
4 pages  
October 13, 2013

Dear BLM Management,

This letter is to serve as an official protest to all of the said properties listed for auction on December 12, 2012 (see pages attached) for leases with intent to frack in the Monterey Shale. The reason for the protest is due to the potential impacts that tracking has on critical resources and the lack of transparency of procedures or chemicals used within the fracking industry. Of specific concern is insufficient documentation regarding:

Water supply  
Water contamination and quality  
Chemicals used  
Air quality  
Seismic activity  
Traffic mitigation  
Other environmental impacts such threats to endangered species

As there is not adequate permitting or disclosure of the fracking process, a moratorium on all leases should be upheld until adequate policies are in place to address the above issues. It should also be further determined by Local and State officials whether access to oil in the Monterey Shale through fracking procedures are in the best interest of California residents, as examples throughout the USA show that tracking may harm the quality of life of residents and real estate values.

Respectfully submitted,

  
Donna Kaufman

To, Bureau of Land Management  
California State Office  
2800 Cottage Way, W1623  
Sacramento, Ca  
95825

10/1012012

To Whom It Concerns,

I hereby officially register my protest regarding the auction of the Monterey Shale for "fracking". I have lived in California since the tender age of 3 months and have lived on the central coast of our state since 1976. This area is not only rife with a diversity of wild life, but also a keystone in the growing of food stuffs for nationwide consumption. Although touted as safe by some, "fracking" can pollute ground water, air and soil; putting both the environment and commerce in grave danger. It has been proven, as well, by the USGS that "fracking" can cause earthquakes. Since the San Andreas Fault, through no fault of its own, runs close to the area that would be "fracked", there is danger of stimulating seismic activity, possibly all the way down to the Diablo Canyon Nuclear Power Plant. Since we know what happens when a nuclear power plant has "an incident", I refer to Fukushima Nuclear Power Plant, for the health and welfare of the state of California we must avoid same.

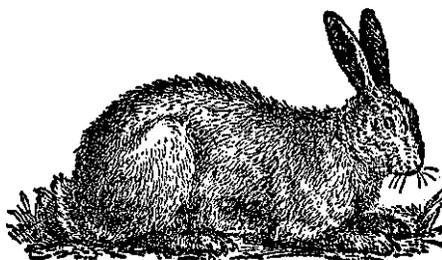
A socio-economic system that is based on fossil fuels is not sustainable. "Fracking" for such a system and leaving an area polluted and polluting for decades to come makes no sense.

Let California lead the nation in doing what makes sense for the environment and long term sustainability.

Thank you for your consideration,



Diana Moll  
518 S. Branciforte Ave  
Santa Cruz, CA  
95062



Melody Monk  
PO Box 6261  
Tahoe City, CA 96145

October 11, 2012

Bureau of Land Management  
California State Office  
2800 cottage way  
Sacramento, CA 95925

Sent via Fax (916) 978-4388

RE: Parcels CA 12-12-1  
Through CA 12-12-15

To Whom It May Concern:

I am a Californian and I am protesting the auction of the Monterey Shale for fracking, in Fresno, Monterey, and San Benito counties. Fracking poisons our water, air, soil, and has detrimental effects on the health of animals, plant life, and human health. Fracking is also known to cause seismic activity, which California does not need.

Please don't allow this to happen in our beautiful state of California.

Sincerely

Melody Monk

Date: 13 October 2012

From: Rob Ryan  
Carol Jensen

To: The Bureau of Land Management- Fax: 1.916.978.4388

Re: PROTEST of your Notice of COMPETITIVE LEASE SALE OIL AND GAS for **17,645.94** acres of Federal lands in Fresno, Monterey and San Benito counties, California.

Sir or Madam,

Please be advised that we, the undersigned husband and wife, are registered CA voters and homeowners who reside at 313 Bardue Street; Aromas, CA 95004; County of Monterey.

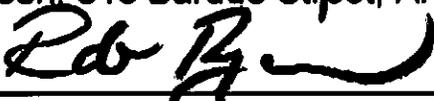
WE PROTEST the sale of the leases described above because:

1. We know the federal government has NOT created safe, earthquake-proof standards for Fracking.
2. We know that our drinking water aquifer connects with the shales your propose to lease as does the air we breathe.
3. We know that tracking operations have devastated and polluted the ground, water and air in areas where they are allowed.
4. Our local county government(s) lack the expertise and budgets to either create or enforce safe, earthquake-proof regulations for tracking operations.

PLEASE HALT THE SALE OF THESE LEASES!

Thank You for Your Attention to Our Concerns,

  
\_\_\_\_\_  
Carol Jensen, 313 Bardue Street, Aromas, CA 95004

  
\_\_\_\_\_  
Rob Ryan, 313 Bardue Street; Aromas, CA 95004

October 12, 2012

Bureau of Land Management  
California State Office  
2800 Cottage Way, W1623  
Sacramento, CA 95825

111 New Montgomery Street  
Suite 600  
San Francisco, CA 94105  
Tel: 415.369.9160  
Fax: 415.369.9180

[www.cleanwateraction.org/ca](http://www.cleanwateraction.org/ca)

**Re: Protest of proposed oil and gas lease sale, December 12, 2012**

To Whom It May Concern:

Clean Water Action, on behalf of its 80,000 California members, urges the Bureau of Land Management to cancel the December 12, 2012 sale of oil and gas leases in Monterey, San Benito and Fresno Counties. Opening up the public lands above the Monterey Shale formation and its 15.4 billion barrels of unconventional oil, will lead to increased use of dangerous enhanced oil recovery techniques such as hydraulic fracturing. This well completion technique, and its associated activities such as disposal of massive amounts of wastewater, pose unnecessary risks to the state of California, its communities and environment, which have not been fully explored, or proven to cause no harm. While it is commendable that the BLM has issued proposed rules for fracking operations on Federal lands, the narrow scope of these rules is not adequate. Disclosure of chemicals and wastewater disposal methods and standards for well casing integrity, are necessary first steps. However, until independent science proves that fracking causes no harm, the BLM should put a halt to the sale of new oil and gas leases where fracking, and other dangerous enhanced oil and gas recovery processes will take place.

There have been numerous examples of problems arising from fracking in other states that are well documented and should be considered in any action, which may lead to more fracking. For example:

- In Pennsylvania,<sup>i</sup> contaminated fracking wastewater was discharged into the Monongahela River, the drinking water source for hundreds of thousands of people in and around Pittsburgh; groundwater has been contaminated with methane; and small rural towns have been overrun with heavy gas industry traffic and air pollution;
- In Pavilion, Wyoming, groundwater contamination has been linked to wastewater discharged from fracking;<sup>ii</sup>
- In Colorado, air pollution from fracking operations has resulted in increased smog (ground level ozone) from volatile organic compounds (VOC's) and health threatening air toxics;<sup>iii</sup>
- In Ohio, a series of earthquakes near Youngstown has been linked to the underground injection of fracking wastewater.<sup>iv</sup>

All across the nation, there are many examples of health and environmental impacts emerging with respect to fracking. California faces unique challenges that require further attention and suggest that a more precautionary approach is warranted. The following California-specific

conditions should be taken into consideration by the BLM in deciding not to move forward with the sale of these lands.

- **Fracking Threatens California's Air Quality and Increases Methane Emissions**

California's Central Valley (home to 4 million Californians), has the highest level of particulate matter and ozone pollution in the United States and the asthma rate is three times the national average, according to the American Lung Association. Deep shale drilling is known to release significant levels of methane gases and volatile organic compounds (VOC's) that cause smog and lead to respiratory problems, and cancer causing air toxics such as benzene and arsenic. The oil and gas industry is the single largest producer of methane gas in the US, accountable for approximately 40% of all methane emissions.<sup>v</sup> In addition to the emissions from drilling, large numbers of trucks are used to transport chemicals to each drill site and wastewater away from each drill site, causing significant increases in particulate and smog-forming pollutants. The cumulative air pollution and health problems that result from fracking are costs and impacts that Central Valley residents cannot bear.

While other states may not be willing to address climate change or worry about air pollution impacts on public health, California has enacted laws that specifically address these problems. AB 32, The Global Warming Solutions Act, is just this year going into effect to require reductions in greenhouse gas emissions all across the state. Furthermore, local air quality regulations are specifically designed to reduce smog and particulate emissions in order to address high rates of asthma and respiratory disease. While the BLM may not be governed by local and state regulations, the Bureau would show a reckless disregard for public health and welfare by ignoring the fact these are problems California is grappling with.

- **California is the most Earthquake-prone State in the Nation**

California's seismological profile makes it a location of special concern with respect to hydraulic fracturing. Opening these public lands to potential fracking demonstrates that careful consideration has not been given to the fact that many of these lands are also located on or near major fault-lines, such as the Rinconada Fault in Monterey. Hydraulic fracturing and the resulting underground injection of wastewater has been linked to increased seismological activity in places like Youngstown, Ohio and Texas. In light of the extreme dangers associated with earthquakes in California and the much more significant levels of seismological activity associated with California's geology, BLM and the State of California have failed to give adequate consideration to the dangers associated with fracking in California's earthquake zones.

The Monterey Shale underlies an area of California's Southern San Joaquin Valley and Central Coast that has also had some of the most serious earthquakes in California history. Without regulations to ensure that fracked wells are secure enough to withstand major seismological activity, Californians have no assurances that when big earthquakes occur, wells containing toxic mixtures of benzene and other carcinogens aren't leaking into groundwater used for drinking water or to irrigate crops.

- **Fracking Threatens California's Water Supply**

Hydraulic fracturing poses serious threats to California's drinking water quality and water supply. California is currently in one of its worst water crises in history,<sup>v1</sup> facing reduced water supply due to climate change and multiyear draughts, the water needs of agriculture and urban uses should take priority. In a state that is home to 35 million people and the largest agricultural industry in

the country, there is simply not enough water to accommodate such high levels of water usage for oil and gas drilling. Fracking has an especially high impact on water resources because most contaminated wastewater from fracking is injected into deep wells and effectively removed from the water cycle instead of regenerating groundwater and waterways.<sup>vii</sup>

The fracking process utilizes a mixture of chemicals, many of which are toxic or are known to cause human health problems. A 2011 study by the US Congress<sup>viii</sup> identified over 750 different chemicals used in the fracking process, including 29 different chemicals that are either: 1) known or possible human carcinogens; 2) regulated under the Safe Drinking Water Act for their risk to human health; or 3) are listed as hazardous air pollutants under the Clean Air Act. Millions of gallons of dangerous chemicals, such as naphthalene, BTEX compounds (benzene, toluene, ethylbenzene, and xylene), methanol and lead are injected into the earth every year, posing serious risks to water sources and air quality. In addition to the chemicals added to fracking products, the wastewater (referred to as “produced water”) from deep within fracking wells contain harmful components such as high salt content, naturally occurring radioactive material, and heavy metals such as arsenic.

The Central Valley is already under major pressure from contaminated drinking water sources. Since 90% of Central Valley residents rely on groundwater, any increase in groundwater contamination is unacceptable. Environmental justice, as defined in California law (Government Code section 65040.12) requires “the fair treatment of people of all races, cultures, and incomes with respect to the development, adoption, implementation, and enforcement of environmental laws and policies.” Low-income residents and people of color are already disproportionately affected by groundwater contamination in the Central Valley and fracking-caused contamination of groundwater would exacerbate the problem.

Wastewater from fracking operations in California is often disposed of into underground injection wells deep beneath the surface of the earth. These wells are known as Class II injection wells under the US EPA Underground Injection Control (UIC) Program. They are often in close proximity to or pass through underground sources of water used for drinking and agriculture. EPA has criticized California’s implementation of the UIC program and monitoring of Class II wells.<sup>ix</sup> In particular, the report criticizes DOGGR’s one size fits all risk assessment for protection of waterways. In a seismically active region such as California, there is increased risk of well-casing failure and the possibility of wastewater transport through faults into aquifers. A recent study of injection wells across the country reported an alarming integrity failure rate of one in six wells.<sup>x</sup> In addition, there is a growing body of evidence to suggest that fluids injected deep into the earth can migrate over time, potentially entering underground sources of drinking water, even in the absence of well casing failures.<sup>xi</sup>

In addition to underground injection, oil and gas companies dispose of wastewater in open-air pits, where the dangerous chemicals can off-gas creating air quality problems, or discharge into waterways, threatening drinking water sources and habitats. Under the Clean Water Act, any discharged water into waterways must be treated, however most water treatment plants are not equipped to handle the types and volume of wastewater from fracking. Lacking regulation and disclosure about wastewater methods, the state does not know the extent to which these different methods are used and if contamination has occurred.

- **The Proposed Sale of Federal Lands is Premature**

With California Division of Oil Gas and Geothermal Resources (DOGGR) in its first ever rulemaking process with respect to hydraulic fracturing, BLM regulations pending, and significant controversy over the practice, now is not the time to sell thousands of acres of new leases. At this point in time, there is considerable uncertainty over the scope of state and federal regulations and which agency will be regulating oil and gas activities on these lands. We believe that the BLM, like the state of California and its Governor, should consider potential impacts to air quality, water quality, earthquake hazards, and public health and welfare before enabling oil and gas companies to continue or expand hydraulic fracturing operations and other techniques to enhance oil and gas recovery in the state of California. At the very least, BLM should wait until all relevant regulations and implementation agreements are in place before opening up more public land in California to fracking.

Monterey, San Benito and Fresno Counties cannot afford to take on these risks. In a region such as Central California, where fresh water is scarce and air quality is poor, any activity that significantly increases the risk of contamination and water use, and air pollution is simply irresponsible. Californians need water to grow food and to feed its cities. Undermining California's farmers by putting water supply and crops at risk is unacceptable. BLM policies regarding public lands should reflect the public's best interests. Opening up thousands of acres to fracking is not what the public needs.

Sincerely,  
Andrew Grinberg



Program Organizer  
Clean Water Action  
415-369-9172  
agrinberg@cleanwater.org

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<sup>i</sup> Groups Reach Settlement with McKeesport in Gas Drilling Wastewater Dumping Case (<http://cleanwateraction.org/press/groups-reach-settlement-mckeesport-gas-drilling-wastewater-dumping-case>)

<sup>ii</sup> US Environmental Protection Agency (<http://www.epa.gov/region8/superfund/wy/pavillion/>)

<sup>iii</sup> Colorado School of Public Health ([http://attheforefront.ucdenver.edu/?p=2546%2526utm\\_source=feedburner%2526utm\\_medium=feed%2526utm\\_campaign=Feed%25253A%252BtheForefront%252B%252528%252540theForefront%252529](http://attheforefront.ucdenver.edu/?p=2546%2526utm_source=feedburner%2526utm_medium=feed%2526utm_campaign=Feed%25253A%252BtheForefront%252B%252528%252540theForefront%252529))

<sup>iv</sup> Scientific American (<http://www.scientificamerican.com/article.cfm?id=ohio-earthquake-likely-caused-by-fracking>)

<sup>v</sup> US EPA (<http://www.epa.gov/airquality/oilandgas/basic.html>)

<sup>vi</sup> Department of Water Resources "California Water Plan Update 2009"

<sup>vii</sup> Western Resource Advocates "Fracking Our Future" p. 14, Fig 2 ([http://www.westernresourceadvocates.org/frackwater/WRA\\_FrackingOurFuture\\_2012.pdf](http://www.westernresourceadvocates.org/frackwater/WRA_FrackingOurFuture_2012.pdf))

<sup>viii</sup> US House of Representatives Committee on Energy and Commerce "Chemicals Used in Hydraulic Fracturing" April 2011 <http://democrats.energycommerce.house.gov/sites/default/files/documents/Hydraulic%20Fracturing%20Report%204.18.11.pdf>

<sup>ix</sup> Horsley Witten Group "California Class II Underground Injection Control Program Review" (<ftp://ftp.consrv.ca.gov/pub/oil/fullreport.pdf>)

<sup>x</sup> Pro Publica "Injection Wells: The Poison Beneath Us" (<http://www.propublica.org/article/injection-wells-the-poison-beneath-us>)

<sup>xi</sup> National Academy of Sciences "Geochemical evidence for possible natural migration of Marcellus Formation brine to shallow aquifers in Pennsylvania" (<http://www.pnas.org/content/early/2012/07/03/1121181109.full.pdf+html>)