

October 4, 2011

Dr. John Lyon
State Director
U.S. Department of Interior
Bureau of Land Management
7450 Boston Boulevard
Springfield, VA 22153

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BUREAU OF LAND MANAGEMENT
WESTERN STATES OFFICE

Dear Dr. Lyon:

I have recently learned that the Bureau of Land Management plans to auction leases for potential mining on 2623 acres of Wayne National Forest along the Hocking River near Nelsonville, Ohio. The leases are for land likely to be used for horizontal hydraulic fracturing of shale gas. I have a personal interest in the BLM's plan as my home sits above the Utica Shale Formation and an aquifer from which I get my water.

Here's my understanding of the drilling process. The centerpieces of this mining include hydraulic fracturing and horizontal drilling. Beginning in the late 1990s, these complex technologies have been used in shale gas mining in Texas, Pennsylvania, Ohio, and a number of other states. They are fraught with a record of environmental mishaps, which when combined with weak or nonexistent state or federal regulations, are justification for concern about the plan to lease parcels from the Wayne National Forest.

Drilling pipes are driven down over a mile and then redirected horizontally for long distances. Although the pipes are encapsulated in concrete and steel, the release of chemicals going down the pipes or gas and water and much else coming up the pipes from poor construction and human error are inevitable.

But the mining of shale gas does not begin with the drilling or end with the deposit of hydraulic-fracturing fluid into the shale formation. It begins with the creation of a drilling pad, perhaps two to three acres in size. Acres of trees will be cut down. The process requires roads and perhaps bridges for large trucks to bring in the equipment and millions of gallons of fresh water for the fracturing method. In the case in question, the water may be withdrawn from an aquifer that provides fresh water for much of Athens County.

Twenty to forty percent of the fracking fluid will come back to the surface with the extracted methane gas and other minerals from the shale rock. I am concerned about where the waste-, or product-, water will be deposited. Over half of the fracking fluid will remain in the deep underground. Where will it migrate to? For example, researchers at Duke University completed research, published by the National Academy of Sciences, which found that average methane concentrations in shallow drinking water in active gas drilling areas were 17 times higher than those in non-active areas. The methane concentrations of drinking water closest to active gas well were considered potential explosion hazards.

Other questions: Will state agencies like the Wayne National Forest office have the expert staff to inspect the mining operations frequently enough? Will the oil/gas companies that obtain the leases be required to reclaim the land, water, and forests they affect?

My view is that BLM should postpone the auctions scheduled for December; since the agency has not considered the potential environmental impacts that high-volume horizontal fracking could have for the Wayne National Forest.

There is much evidence to justify a formal protest against the proposed BLM leases. I do not take it lightly. But I strongly believe that we must not rush into more mining that will potentially produce more environmental devastation before we have a full understanding of what, in this case, shale gas mining will impair the lives and health of local families and disrupt whole communities.

Sincerely,

Robert Sheak
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