



Athens Conservancy

PO Box 2281, Athens, OH 45701
www.athensconservancy.org
info@athensconservancy.org

October 3, 2011

VIA FACSIMILE: (740) 593-1130

**Athens Conservancy
Board of Directors:**

President:
Donna Goodman
Vice-president
Philip Cantino
Secretary:
David Gedeon
Treasurer:
Sally Zalek
At-large:
Christine Fahl
John Knouse
Elaine Mather
Bob Scott Placier
Diana Potter
David Schatz

United States Department of the Interior
Bureau of Land Management
Eastern States
7450 Boston Boulevard
Springfield, Virginia 22153

**RE: Protest of the Bureau of Land Management's Notice of
Competitive Oil and Gas Lease Sale Concerning Parcels in Ohio**

Dear Sir or Madam:

The Athens Conservancy hereby protests the Bureau of Land Management's planned offering of ES-043-12/11, OHES 57246 ACQ (264.93 acres); ES-044-12/11, OHES 57247 ACQ (1,238.06 acres); and ES-045-12/11, OHES 57248 ACQ (1,120.58 acres) at the December 7, 2011 lease sale in accordance with 43 CFR 3120. These parcels are publicly owned lands of the Wayne National Forest in Athens County, Ohio.

Statement of Reasons: The Athens Conservancy is a 501(c)(3) land trust whose mission is the protection of open-space lands in Athens County, Ohio. The Conservancy owns several nature preserves, which are open to the public. One of them, known as the Bluebell Preserve, is contiguous with one of the Wayne National Forest parcels that the BLM proposes to lease for gas extraction (Tract A-8103 within ES-045-12/11). We are concerned that the release of hydrofracturing fluid and air emissions from a well on this tract could damage or destroy the forest that this preserve was established to protect.

Tract A-8103 also borders on the Hockhocking-Adena Bikeway, which is the second biggest tourist attraction in Athens County. Siting of drilling equipment within view of the bikeway, or any accident that resulted in pollution of the water or soil along the bikeway, could have a serious economic impact on a region in which tourism is a major source of income. Even if the drilling equipment were located out of view of the bikeway, the noise it produced could decrease the desirability of the bikeway for recreation and thus its ability to attract tourists to the county. Furthermore, water or air pollution resulting from hydraulic fracturing in any of the Athens County tracts, all of which are close to the Hocking River upstream from Athens, could have a major negative effect on the local economy. This in turn would impact the Athens Conservancy since the

effectiveness of the Athens Conservancy as an organization is dependent on a healthy local economy. We rely heavily on private donations from local residents in order to continue to acquire open space land for preservation and manage the preserves we already own. The threat to the water supply for the city of Athens is a grave concern. The only aquifers suitable for public water supplies in our area are the highly permeable glacial outwash deposits along the Hocking River. The clay soils in the surrounding hills cannot produce anywhere near the flow volume needed. Consequently, any drill site near the Hocking River is especially dangerous because a spill of hydrofracturing fluid could quickly find its way into the public water supply for the city of Athens and Ohio University.

The Bluebell Preserve was established because it has an unusually dense and diverse herb layer beneath a healthy forest canopy. The preserve is not badly impacted by invasive non-native plants, as the majority of Ohio woodlands are. Its position along the Hockhocking-Adena Bikeway enables the public to enjoy a luxuriant display of native spring wildflowers, which attract many visitors. Because the area is underlain by the Utica Shale, we assume that the companies that will be bidding on the lease are planning to use horizontal hydrofracturing to access the gas and oil in this deep layer. Although the proponents of this technology claim it is safe, Ohio regulations permit volatilization and/or flaring of organic compounds and methane, which will impact air quality and forest health. Ohio regulations permitting open pits for fracking sludge will also imperil air and water quality in the vicinity. Furthermore, accidents have occurred in the course of drilling and hydrofracturing in other states that have exposed people and natural biotic communities to toxic chemicals. There is no reason to assume that accidents would not happen here if horizontal hydrofracturing is permitted.

In an experimental study conducted by a US Forest Service soil scientist in West Virginia, recently reported in a peer-reviewed scientific journal (*Journal of Environmental Quality* 40:1340-1344 [2011]), it was demonstrated that hydrofracturing fluid can cause severe damage to forest vegetation. "During application [of hydrofracturing fluid], severe damage and mortality of ground vegetation was observed, followed about 10 d[ays] later by premature leaf drop by the overstory trees. Two years after fluid application, 56% of the trees within the fluid application area were dead." In a separate study of a drilling operation in West Virginia, severe damage to trees and understory vegetation was observed as a result of accidental aerial release of fluids due to loss of control of the drill bore (USFS Technical Report NRS-76). If such an accident were to occur in tract A-8103, it could devastate the Athens Conservancy's Bluebell Preserve.

On broader health, environmental, and economic grounds, we object to the permitting of horizontal hydrofracturing on any of the parcels that are for sale in Athens County, but we object most strenuously to the inclusion of tract A-8103 in the sale because of the possibility of damage to the forest community in the Athens Conservancy's Bluebell Preserve, as well as possible impact on the Hockhocking-Adena Bikeway and consequently the local economy. The Athens Conservancy therefore requests that BLM withdraw the protested parcels from the December 2011 Competitive Oil and Gas Lease Sale.

Sincerely,



Philip Cantino, Vice President*

*Donna Goodman, the President of the Athens Conservancy, is not available to sign this letter but she and the entire board of the organization have read it electronically and agree with its content.