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JUL 31 2013

Cynthia N. Vigneron  
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Delton, MI 59046  
July 28, 2013

BUREAU OF LAND MANAGEMENT  
ES-NSFC

Bureau of Land Management  
Department of the Interior  
Northeastern States Field Office  
626 E. Wisconsin Ave., Suite 200

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Dear Sirs:

I am writing to voice my concern regarding a planned sale of oil and gas leases under the surface of the Allegan State Game Area in west Michigan. I have reviewed documents from The BLM Northeastern states Field Office that state a Finding of No Significant Impact (FONSI) relating to the planned September, 2013 sale and an earlier sale that occurred in 2012. I feel that the assessment that predicated the FONSI was a minimal environmental assessment and that a full Environmental Impact Statement under the National Environmental Policy Act must be conducted before any further leasing occurs for the following reasons:

- The water use in the environmental assessments may be grossly underestimating the quantity of water required in Michigan shale formations. Recently, unprecedented quantities of water have been used to fracture a single lateral leg. One well used 31 million gallons and two others used 18 and 21 million gallons, respectively. These volumes are up to 6 times greater than estimated, putting the largest amount of total water use at approximately 1.8 billion gallons.
- Horizontal hydraulic fracturing is commonly being used to extract natural gas. This process is hundreds of times more impactful on health, safety and the environment than conventional drilling methods that were likely used as assumptions in the BLM assessment for this leasing area.
- The BLM assessment concluded that there would be little or no disturbance in areas designated 'nondevelopment'. However, other entities than the lessee itself will be building infrastructure such as roads, pipelines, water wells, compressors and refineries. Additionally, the lessee can seek a variance or amendment of the lease to reclassify it from nondevelopment to development. This is a process that can quickly get out of control, as we have seen in other areas where natural gas extraction has been developed.

As a long-time resident of west Michigan, I emphatically do not want to see some of the impacts acknowledged by the BLM in the environmental assessment come to pass, such as 'create noise and change the views in ways that will make the area less attractive . . .

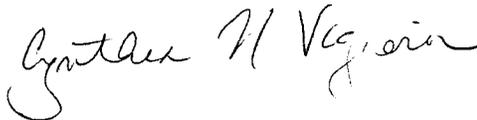
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noise would drive away the animals that hunters seek' or 'disturbance of wetlands to widen roads and lay pipelines'. The BLM documents also identify risks of migration of contaminants up to groundwater layers from multiple fractures. Although the BLM believes the concerns can be addressed at the permit application stage, in Michigan, we know that our Department of Environmental Quality (DEQ) is severely understaffed, with only 25 inspectors to oversee over 12,000 wells and many of its departments closed or only minimally staffed in recent years. This disjointed regulation adds an additional layer of concern to the picture. The BLM may 'assume' State will regulate the process when in fact the State is understaffed. Additionally, the MI DEQ considers permits on an individual basis; there is no cumulative study of the impacts of having multiple wells in a particular area.

This letter is just a small high level summary of a few of the concerns with leasing our protected lands for oil and gas development. Our Allegan State Game Area is home to many native and endangered reptile, bird, butterfly and plant species, as well as large tracts of wet forest land and vernal pools. Once the leases are sold, the process is not under good control, and companies from all over the nation and the world may come in and cut up our reserved natural area, likely causing irreversible damage. I urge the Bureau to refrain from signing any more leases and render new decisions on requests to lease until a full, thorough and complete Environmental Impact Assessment, pursuant to the requirements of the National Environmental Policy Act can be conducted and reported.

Sincerely,

A handwritten signature in cursive script that reads "Cynthia N. Vigneron". The signature is written in black ink and is positioned above the printed name.

Cynthia N. Vigneron