



## The Hocking River Commission

linking Fairfield, Hocking and Athens Counties  
through stewardship, education and recreation

P.O. Box 5847  
Athens, OH 45701  
740-591-1763

October 6, 2011

Dr. John Lyon  
Eastern States Office Director  
United States Department of the Interior  
Bureau of Land Management  
Eastern States  
7450 Boston Boulevard  
Springfield, Virginia 22153

**RE: Official Protest of the Bureau of Land Management's Notice of  
Competitive Oil and Gas Lease Sale Concerning Parcels in Perry, Galia, and  
Athens Counties, Ohio**

Dear Dr. Lyon:

The Hocking River Commission hereby protest the agency's planned offering of ES-041-12/11, OHES 57244 ACQ (528.15 acres, Perry County); ES-043-12/11, OHES 57246 ACQ (264.93 acres, Athens County); ES-044-12/11, OHES 57247 ACQ (1,238.06 acres, Athens County); and ES-045-12/11, OHES 57248 ACQ (1,120.58 acres, Athens County) at the December 7, 2011 lease sale in accordance with 43 CFR 3120.1-3. The four parcels are publicly owned lands of the Wayne National Forest, and will hereinafter be referred to as Parcels 41, 42, 43, 44, and 45, respectively. The Hocking River Commission has passed a resolution in protest of the above planned offerings and has authorized the HRC president to file this protest on behalf of the Hocking River Commission.

The Hocking River Commission (hereinafter 'HRC') was founded in 1991 to serve as a nonprofit spokes group for the Hocking River, through education, stewardship, and promotion of river-corridor recreation. The Hocking River Commission is a State of Ohio 501c-3 charitable corporation and Land Trust. The Hocking River Commission has worked to improve the water quality of the Hocking River by addressing both non-point and point sources of pollution

entering into the river and is now protesting the oil and gas leases based on the potential negative environmental consequences of drilling and attendant activities and processes.

As the above referenced parcels are adjacent to the Hocking River or its tributaries and the drilling technology known as hydraulic fracturing may have multiple deleterious consequences, such as potential pollution of the Hocking River and its underlying aquifer, extremely large withdrawals of water required for drilling, large retention ponds which may contain chemicals of a proprietary nature whose make-up is known only to the operator, surface runoff and erosion from drilling and attendant activities.

HRC believes the drilling and use of water chemical slurry in the fracturing process is a potential risk to the public, health, safety and welfare. HRC is also concerned about the vast quantities of water necessary for hydraulic fracturing and the potential consequences of overdrawing water from the aquifer and/or Hocking River. The freshwater aquifer under the Hocking River is the sole water source for the cities of Nelsonville and Athens and the Le-Ax Rural water district which serves the Village of Albany, plus 6,750 rural customers in 17 townships in 4 counties. Over 40,000 citizens rely on this aquifer as their primary water source.

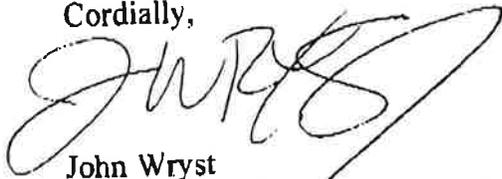
HRC believes that the BLM and FS may violate NEPA if these leases are offered for sale. The FS (and BLM) are relying on the analysis contained in the 2006 Wayne NF LRMP, Record of Decision and Final EIS, for the site-specific preleasing NEPA analysis necessary to assess the impacts arising from oil and gas exploration and development on these leases. However, none of these documents contain the site-specific analysis necessary to satisfy NEPA's requirements, especially that for a "hard look" at the impacts. Moreover, circumstances have changed and new information has arisen since the 2006 FEIS was completed, necessitating further analysis. See 40 C.F.R. § 1502.9(c)(1) (supplemental EIS must be prepared when there are significant new circumstances or information).

High volume horizontal hydraulic fracturing, or "fracking," differs significantly in many respects from conventional oil and gas drilling and the hydraulic fracturing which was used in previous years. The 2006 LRMP FEIS touches only very briefly on directional drilling, and fails to provide any analysis of the potential environmental impacts of directional drilling. Moreover, the more specific practice of high volume directional (or "horizontal") hydraulic drilling/fracturing is nowhere mentioned in the FEIS as the use of this process in drilling shale formations such as the Utica and Marcellus began only after the 2006 FEIS was completed. Since that time the practice has become widespread in neighboring states such as Pennsylvania and West Virginia and has become a threat to numerous water systems and supplies. The practice is now rapidly expanding in the State of Ohio. More study is needed and protections for the public health, safety and welfare need to be in place before the practice is allowed to negatively impact irreplaceable public resources.

For these reasons the Hocking River Commission is protesting the leasing

of Parcels 41, 42, 43, 44, and 45 in the Wayne National Forest.

Cordially,



John Wryst  
President, Hocking River Commission  
cc Senator Sherrod Brown  
Wayne National Forest  
Athens County Commissioners  
City of Athens  
State Representative Debbie Philips Dist.