

Frank
Jesse Juen
U.S. Bureau of Land Management
New Mexico State Office
PO Box 27115
Santa Fe, New Mexico 87502

Dear Mr. Juen,

Having lived in New Mexico most of my life and as a long-term resident of Rio Arriba County, I am writing to protest the leasing of parcels NM-2014-001, and NM-2014-004 through NM-2014-015 located in the Rio Chama Watershed and east of the Continental Divide.

I am seriously concerned about numerous health issues that would be generated by such leasing of BLM land for gas and oil exploration, including contamination of drinking water, safe water for ranching and farming, air pollution, light pollution, stress on infrastructure, and the critical danger of fire in The Santa Fe National Forest sparked by hydraulic fracturing or "fracking."

If the lease sale goes through, The Bureau of Land Management will be in violation of the National Environmental Policy Act. The BLM cannot rely on an outdated Resource Management Plan from 2003. A new Resource Management Plan must include the Mancos Shale in the San Juan Basin and East of the Continental Divide before parcels are offered for lease, as the 2003 Resource Management Plan does not address Shallow Shale Hydraulic Fracturing. Failure to do so would be in violation of the law.

Previous BLM studies are based on Traditional Hydraulic Fracturing that drills a vertical well bore and occurs below the aquifer. The drilling technology actually practiced in the San Juan Basin is Shallow Shale Hydraulic Fracturing and Horizontal Drilling above the aquifer. Hundreds of news reports and several studies reveal Shallow Shale Hydraulic Fracturing and Horizontal Drilling are risky new technologies with a proven potential to drive toxic and carcinogenic chemicals down into the aquifer and contaminate our water.

A single failure of one well could contaminate the precious water essential to all life in and below The Chama River Valley. Once our water is poisoned there is no going back in time. The liabilities are far too great for all involved, and not just families, ranchers, farmers, but Abiquiú, Española, Albuquerque, the BLM and the oil and gas companies involved in any accident, spill or unintended consequences.

Two to eight million gallons of water are needed to fracture a single well. The water will be locally sourced and permanently removed from rejuvenating the hydrologic cycle. Rio Arriba County has been experiencing a severe drought which affects the ability of the aquifer to recharge. West of the Continental Divide, the aquifer consists of brine and is not considered potable. East of the Continental Divide, the Morrison Formation aquifer continually recharges and is a source of drinking water that feeds springs, acequias and wells.

The geology east of the Continental Divide is distinct from the San Juan basin. BLM has not completed the legally required studies (RPM) to drill in the Mancos shale. The BLM Environmental Assessment (EA) alleges that fracturing in the Mancos shale would not occur above 5,700 feet below the ground surface. This is not true as supported by geological evidence, as the Mancos formation is shallow and less than 1,000 feet below the surface. The fracturing would actually take place above the water table, greatly heightening the liability of water contamination

The Morrison Formation aquifer is a tributary to the Rio Chama, which flows into the Rio Grande, including 60% of the water for our entire state. This water is already legally allocated to downstream users. Clearly, hydraulic fracturing and horizontal drilling create critical liabilities. Surely, we all agree water is more valuable than oil. Life cannot live without safe, clean water.

Hydraulic Fracturing has been scientifically linked to a dramatic increase in earthquakes, even in areas that usually experience little to no seismic activity. Example: the recent scientific studies that have proven that earthquakes are caused by the impact of injection and the degradation of bedrock. Most shockingly, numerous faults have been detected under the Abiquiú and Heron Reservoirs. The impact of earthquakes on these dams could have catastrophic effects for residents and downstream water users. This has not been addressed in the BLM Environmental Assessment which is a legal requirement.

The BLM proposed leases would be the first significant oil and gas leases in the Rio Chama Watershed. The Taos BLM Field Office has deferred drilling in parcels in Cebolla citing the need for further study. The parcels in Gallina and Cebolla are both east of the Continental Divide and share similar geology. It is clearly transparent the only division is in the politics, and the line on the map between the Farmington BLM Field Office and the Taos BLM Field Office.

Oil and gas companies are not legally required to disclose the chemicals they inject into the wells. In 2011 The House of Representatives reported that of 2,500 hydraulic fracturing products, 650 contain known carcinogens. Spills in

New Mexico's oil and gas fields set records in 2012, with nearly 700 self-reported accidents. At least thirty reported spills during 2011 and 2012 impacted a waterway or groundwater supply.

Does the BLM really want to trigger the risk of releasing hydrochloric acid, benzene, isopropanol alcohol, ethylene glycol, kerosene, naphthalene, toluene, tetraethyl ammonium chloride (which is extremely toxic to aquatic organisms) and hundreds of other carcinogenic chemicals into our water? It is scientifically factual and commonly known that hundreds of chemicals used in hydraulic fracturing damage the endocrine glands, including the pancreas, thyroid gland, pituitary gland, adrenal glands, hypothalamus, ovaries and testes.

Clearly fracking is very dangerous to our water and forests, as proven by verifiable accidents in Texas, Colorado, Oklahoma, West Virginia, Pennsylvania, New Jersey and New York. More and more states, counties and communities throughout the country are banning fracking. The impact on New Mexico could be disastrous.

Also of concern is a byproduct of fracking. Hundreds of million of gallons of gas are commonly released into the air, or burned off by "flaring" -- like lighting a giant blowtorch. The proposed parcels are in a region of New Mexico where catastrophic forest fires have occurred in recent years due to drought.

I am in favor of sensible oil and gas exploration and, at the same time strongly support the development of cleaner, safer alternatives such as solar and wind which could generate tremendous financial gains for our state. New Mexico has the potential to lead the nation in alternative energy which will create clean jobs that will not harm the environment and generate new sources of tax revenues.

Most importantly, the risks and liabilities of fracking in The Rio Chama Watershed are far too great. Your response can be sent to me at the address below.

Respectfully,



Frank Cody
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