

8/14/2014  
August 14, 2014

Director Juen,

I am writing in regards to the October 22, 2014 oil and gas lease sale. I am requesting that you defer parcels NM-201410-001, 004 thru 015.

I own and operate a commercial farm in Rancho de Abiquiu. I reside on the farm and have no other source of income except what I make from the land. I am a member of the Jose Pablo Gonzales Acequia, which is in turn a member of the Rio Chama Acequia Association.

As a farmer, I am particularly concerned about the proposed lease sales for the following reasons.

Earlier this year the Taos BLM field office chose to defer the parcels near Cebolla because of what they termed "considered risks". I implore you to follow the lead of the Taos BLM field office and defer these sales until accurate and complete study can be made of the hydrogeology east of the Continental Divide.

All of the parcels in the October 22, 2014 lease sale were deferred except those in the Santa Fe National Forest. How are the parcels in the National Forest differentiated from the parcels on BLM land? I wrote to BLM employee Becky Hunt asking this question over a month ago and have yet to receive a response.

It appears that the National Forest has already procured a FONSI, while the BLM parcels are still operating on the out of date 2003 Mancos Formation/Gallup RMP and for this reason granting them a FONSI would be in violation of NEPA. Interestingly, it also appears that the National Forest FONSI relied heavily on the same outdated 2003 RMP.

This leads one to believe that the difference between the BLM and National Forest parcels is solely bureaucratic and does not reflect adequate study.

In the EA the difference between the hydrogeology in the San Juan Basin and the Rio Chama Platform where parcels NM-201410-001, 004 thru 015 sit has not been addressed or considered. If the EA is not place specific, it is a rubber stamp.

Any surface water contamination could affect the Rio Chama Watershed and the Rio Grande by way of the Rio Gallina and the Rio Puerco, both of which recharge from this area.

Below ground water contamination could affect the Morrison Formation Aquifer, a potable aquifer that delivers water to uncountable springs, acequias, and wells. As the 2003 RMP does not address shallow shale fracturing in this unique and unstudied geology, it seems particularly risky to fracture above this valuable aquifer.

Even without the risk of contamination, oil and gas development is not a responsible use of our limited water resources. The EA states that water will be locally sourced, but does not say how much water will be used. It is my understanding that these private companies will

be able to make an appeal to the State Engineer for even more water should they, not local residents, deem it necessary. After this water is used or is trucked elsewhere, it will be contaminated with fracturing chemicals and will be permanently removed from the hydrologic cycle. This is not a good use of our water during an extreme drought.

These lease sales also represent an affront to social justice that WILL in fact disproportionately negatively affect rural, minority, tribal, and impoverished peoples. Should something go wrong, residents and local tax payers are the ones who will be left to clean it up.

These lease sales are a form of collateral damage, just like LANL, that allow the rest of the country affordable fuel or national security, but pays hardly any benefits to Nuevo Mexicanos besides jobs that are a short term fix and in the meantime implicate us in the damage of our own natural resources.

I recognize that oil and gas revenues make up a significant portion of New Mexico's budget and the paychecks of those employees, but enough is enough, poisoning our land to maintain the status quo is not an acceptable option. We must be sure of the ground water flows, the location of the shale and existing fault lines before any irreparable damage is done.

From my discussions with many local residents it appears that the BLM public scoping was inadequate. I myself heard nothing and saw no notification. Even the post master in Coyote had not heard about these lease sales after the scoping period had taken place. And the rural postmaster Mr Juen, knows every bodies business. How can BLM say that they have involved local residents with their policies in any meaningful way?

For these reasons and many others, I request that you defer these parcels until any potential risks have been studied thoroughly and local residents actively involved in the decision making process.

I await your response.

Sincerely,



Clare Price  
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