

July 25, 2014

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NM State Office
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Director Juen;

We are residents of the area under consideration for fracking leases and are writing to protest the inclusion of the Gas Lease Sale for the Farmington Field Office. These parcels are NM 201410-001, 004, 05, 006, 007, 008, 009, 010, 011, 012, 013, 014, and 015. We ask that these remaining parcels east of the Continental Divide be deferred for the same reasons that the other 22 parcels were deferred as they are in the same geologic and geographic location.

As residents of the area in which BLM is planning on leasing mineral rights on several parcels of public and private land, we send you this as our protest to this action.

Incomplete Study and Disregard for Procedure -

The 2003 Resource Management Plan and the Mancos Shale/Gallup information RMPA/EIS alternative studies do not address shallow shale hydraulic fracturing (fracking). If the lease sale continues, BLM will be in violation of the National Environmental Policy Act.

Aquifer Pollution -

BLM representatives at the October 25, 2012 meeting stated that the wells drilled on these leased parcels would be thousands of feet deep – far below any local water tables, thus eliminating any possibility of aquifer pollution. They also stated that there have been no documented cases of hydraulic fracturing polluting water supplies.

We have since learned that the shale in the Cebolla area is only several hundred feet below the surface leaving the aquifer readily accessible to pollutants from the fracking process.

It was reported in September, 2012 that “a U.S. Geological Survey report on its water testing of one monitoring well near the rural Wyoming town [of Pavilion] -- where some residents complain that gas drilling and hydraulic fracturing contaminated their drinking supplies -- identified levels of methane, ethane, diesel compounds and phenol, which the EPA had also identified in its report last year.”

As recently as April, 2014 a Wise County Texas family was awarded a settlement when the courts determined that their water had, in fact, been polluted by area fracking.

Water Usage -

With several private water supply wells going dry in the last few years and the fact that our area remains in what has been called a “superdrought” of 20 years duration, our concern over the massive amounts of water required for fracturing is certainly understandable. Since hydraulic fracturing requires, literally, millions of gallons of water per incident, we have not heard any explanation of where

these quantities of water will come from. This is a high desert receiving roughly 12" of rainfall a year. If we do not receive enough rainfall to keep our water wells filled, we certainly don't have the water to supply gas and oil well-drilling activity.

Earthquake Activity -

A study conducted recently by British Columbia Oil and Gas Commission has concluded that fracking does in fact cause earthquakes. They are not referring to the injection of "produced water" after the fracking has been completed. "The seismicity observed and reported by NRCan in the Horn River Basin between April 2009 and December 2011 was induced by fault movement *resulting from injection of fluids during hydraulic fracturing.*" (emphasis added)

Earthquake activity directly related to the hydraulic fracturing process is also evidenced of late in Pennsylvania, Oklahoma, and Ohio – hardly considered to be earthquake-prone areas. Since our homes rest in a geological area that was virtually created by earthquakes, how much more would this be an issue?

Landscape Damage -

One look at the areas of our county that are currently under use as oil and gas well sites shows the incredible damage done to our fragile landscape. This is a high desert with little rainfall and extremely fragile vegetation and topsoil. The areas currently under use near Farmington are totally denuded and will likely take hundreds or even thousands of years to even begin to recover. At least one rancher has related that the damage done to his property remains unreclaimed after more than a year.

Socio-economic Impact -

Considering the lower economic state of Rio Arriba county and the quality of the roads that are in place, damage to our county and state highways as well as local roads would be extensive and beyond the financial capabilities of our county to repair. Well drilling of any sort requires large numbers of heavy equipment and trucks moving about the roadways and landscape many times a day. These are repairs that a lightly populated, less than affluent county simply cannot afford to undertake.

Additionally, the BLM Environmental Assessment states, "An assumption is that the No Action Alternative would not affect current domestic production of oil and gas." So what is the purpose of using up and polluting our water and air and damaging our landscape if the lack of whatever might be found in our area will have no positive economic impact?

Wildlife -

In addition to the Wild and Scenic Rivers area of the Chama Valley, the Cebolla area and much of the Chama River Valley is a wildlife migration route for a large deer and elk population. Studies have shown that drilling activity of any sort consistently disrupts these routes, forcing the area's native wildlife to relocate. In addition to the nationally protected areas of our valley, much of the limited income in our valley derives from hunting and fishing expeditions. The socio-economic damage due to loss of hunters, fishermen, and eco-tourists that support the area economy as well as the habitat damage caused by the equipment and vehicles involved in these lease sale uses would likely never permit recovery.

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Fracking Bans -

France and Bulgaria banned fracking earlier in 2012 due to just such environmental concerns as we have stated here. Australia has issued a moratorium on hydraulic fracturing. Perhaps they know and acknowledge something that the BLM does not.

Air Quality and Climate Change -

Flaring is a common practice used in fracking in which enormous amounts of hydrocarbons are released directly into the atmosphere. Flaring also poses an extreme fire danger in our Santa Fe National Forest. Presence of humans and animals within a 3-12 mile radius has been identified as dangerous to health. While wastewater pits are another means of disposing of toxic sludge created by fracking, the pits are open and left to simply evaporate.

A Finding of No Significant Impact for the October 22, 2014 Oil and Gas Lease Sale is not adequately supported by the Environmental Assessment as it now stands.

Sincerely,



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