

August 8, 2014

CERTIFIED MAIL

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

RE: Protest proposed sale of parcels NM-2014-001, 004 through 015

Dear Mr. Juen:

My name is Elizabeth J. (Beth) Ferguson and I am writing to protest the proposed sale of parcels NM-2014-001, 004 through 015. I reviewed the Environmental Assessment for the Farmington Oil & Gas Lease of October 2014 and as a layperson, I find a number of problems, and believe it should not be supported and that you defer action on the 13 parcels up for lease.

My Interests in this protest:

I am a homeowner and live in the home I built on 15 acres of land between Youngsville and Abiquiu near the lake in Rio Arriba County. My health, safety and financial security in my retirement years are grounded in the environmental safety of this area and its water resources. The land value to my heirs and neighbors could also suffer adverse results.

Reasons for Protesting:

A finding of No Significant Impact (FONSI) for the October 22, 2014 Oil and Gas Lease Sale is not adequately supported by the Environmental Assessment as it now stands. The geology of the parcels already deferred by the BLM and the geology of these parcels in Santa Fe National Forest are the same. Neither should be used for oil and gas exploration for many reasons, some discussed below.

We live in an arid part of the country; we've been experiencing severe drought. Some wells already are slowing, raising concerns that there is less water in the aquifers. Since 3 to 5 million gallons of water are needed to fracture just one well and the water used will come from local sources. Now especially if the drought continues, fracking operations will divert water from farmers, homeowners, ranchers and recreational users.

The Morrison geological formation is a vital aquifer in the Rio Chama watershed where I, and many others, live east of the Continental Divide. The Morrison formation continually recharges and is the potable watersource feeding springs, wells, acequias as well as the Rio Grande. More than half of the water for our state is fed by water sourced in the Morrison formation. Water in areas that BLM approved west of the Continental Divide are not considered potable so our area should not be painted with the same brush in decision-making.

In addition to the availability of the water in the aquifer, I have major concerns about the potential damage to the quality of our water. There are substantial risks of contamination associated with drilling in these shallow geological formations. Should the water be contaminated by an accident or other actions associated with the drilling, this toxic water will harm, perhaps even poison, the water supplies of millions of people here in the Rio Chama watershed and downstream.

Further the Environmental Assessment does not address the methods to be used in disposing the millions of gallons of water used in the process; the water is altered, contaminated, and cannot simply be returned to the soil and the water table without adverse impacts.

Spills are another source of contamination. In 2012, spills in New Mexico's oil and gas fields set records, with nearly 700 self-reported accidents. At least thirty reported spills during 2011 and 2012 impacted a waterway or a groundwater supply. These recent events demonstrate that drillers and their investors cannot claim they will not have accidents or cause environmental damage.

Further, I am concerned about carcinogenic and endocrine effects of chemicals used in hydraulic fracturing. Oil and gas companies are not required to disclose the chemicals they inject into the wells. A 2011 House of Representative Study reported more than 600 known carcinogens are part of the known hydraulic fracturing products. Further, T. Colborn et al, *Our Stolen Future* documents long-range unintended consequences of untested chemicals and synthetic chemicals on male fertility, intelligence, wildlife and humans.

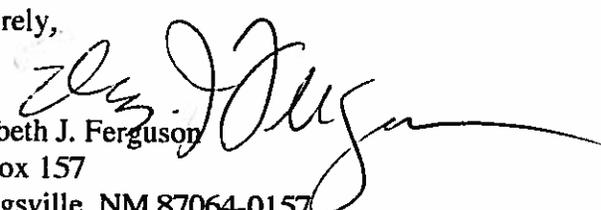
Earthquakes: bedrock is degraded by fracking and has been scientifically linked to dramatic increases in earthquakes. Texas, Pennsylvania, Northern Ohio, Arkansas and southern Colorado come to mind. Perhaps you haven't considered that our area at the edge of the Colorado Plateau and the Rio Grande Rift has many documented faults. Some are exposed in our area around Abiquiu Lake, Ghost Ranch, the bottom of Trujillo hill and the Army Corp of Engineers dam. Others, not visible, could also damage the dam and the Abiquiu Lake/Reservoir. An adverse event that severely damaged the dam could inundate homeowners and farmlands further down river.

Earthquakes could also damage heritage sites, homes, churches, monasteries, roads, *acequias*, etc. Thousands of years of historic and pre-historic sites dot our area, documenting waves of human history. Parts of the unique Gallina civilization ruins could be impacted. Segments of the Old Spanish Trail run through some of the proposed areas. New Mexico would lose tourism dollars if these areas and the pristine national forests were the site of active drilling operations, let alone when damage is caused.

Environmental effects of drilling with its flares, waste-water pits and increased large rig traffic harm not only the cultural and historic sites in this area, they negatively effect tourism and recreational uses, as well as those of us who live here. The drilling activities will increase noise pollution, heavy traffic damaging our already poor rural roads and otherwise damage our infrastructure. The generators, bright lights, and other environmental effects of these activities will make our area less attractive to visitors who are a major source of revenue to the area.

In closing, I've described many of my reasons for protesting this potential action by the BLM: negative impacts on -- the quantity and quality of our water, fragile aquifers, dark skies, cultural resources as well as chemical pollution of the environment, carcinogenic and endocrine damage to humans, and the potential for earthquakes with their ensuing financial and human damage. Any damage threatens the water supply of millions of people and substantial financial losses to millions of citizens. Therefore, I strongly protest your proposed action and implore you to remove the 13 parcels of land, east of the Continental Divide, from consideration for sale/lease. Please send your response to my letter (which I understand is mandatory) to my address below my signature.

Sincerely,


Elizabeth J. Ferguson

PO Box 157

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