

Bureau of Land Management
Farmington Field Office
6251 College Blvd
Farmington, NM 87402

June 26, 2017

Dear District Manager Victoria Barr,

We write to urge greater protections for Greater Chaco and to reassert the call on the New Mexico Bureau of Land Management for an immediate moratorium on the combination of horizontal drilling and hydraulic fracturing (together “fracking”) and related activities until the current Resource Management Plan Amendment process is complete and adequate protections are assured for the people, environment, and sacred places of the Greater Chaco region in the San Juan Basin in Northwestern New Mexico.

The June 6, 2017 [Scoping Report](#) by the U.S. Bureau of Land Management and U.S. Bureau of Indian Affairs finally acknowledges many of the issues at stake and longstanding with unchecked and industrialized fracking development that is currently besieging Greater Chaco. We reaffirm that the draft Resource Management Plan Amendment must assure protection for community health and social impacts, climate, air, and water protection, and protection for all sacred and cultural places, not limited to designated archaeological sites. Tribal consultation has been flawed, remains incomplete, and fails to comply with National Historic Preservation Act requirements. There is a marked absence of consultation with the 19 Northern New Mexico Pueblos that trace lineage to and have a vested interest in Chaco Culture.

Your agency received more than 15,000 comments overwhelmingly opposing current oil and gas development in the region during this scoping period. Earlier this year, the Navajo Nation and All Pueblo Council of Governors [called for a moratorium](#) on fracking-related activities in Greater Chaco; a request that came on the heels of passage of support legislation in the New Mexico Legislature sponsored by [Rep. Derrick Lente](#), demands from 15 Navajo Nation Chapters resolutions, dozens of letters from over one hundred organizations, and petitions signed by over 300,000 citizens calling for an end to fracking development in the region.

The resource management planning process isn’t expected to be complete until 2020. In the meantime, while the Bureau of Land Management admits to never having analyzed the impacts, or properly planned for, fracking the Mancos shale, the agency has nonetheless, leased thousands of acres and approved more than four hundred individual wells through boilerplate Environmental Assessments tying to an outdated 2003 Resource Management Plan that further fragments the checker boarded area of Tribal, allotment, state, and federal lands in Greater Chaco.

We renew our call for an immediate moratorium on all permitting of drilling, leasing of further lands for drilling, and approval of related infrastructure, until the

Bureau of Land Management completes the current Resource Management Plan Amendment and has approved such development with adequate consultation.

Existing, non-producing oil and gas leases as well as expired and inactive wells must be retired. With more than 91% of available mineral resources in the San Juan Basin already leased for oil and gas development, balance must be restored in order to comport with the Bureau of Land Management's duty to provide for multiple use of public lands and resources.¹

The entire development area must undergo a new full Environmental Impact Statement. The impact of new Mancos-Shale fracking is so great, the failure to require a full environmental impact statement that includes a comprehensive health and social impact assessment is nothing short of irresponsible. As outlined in the Final Scoping Report, the Bureau of Land Management and Bureau of Indian Affairs must follow through with a thorough analysis of fracking-related impacts to: air resources, climate change, noise, recreation and night sky, cultural resources, soil resources, water resources, socioeconomics, environmental justice, wildlife, special status species, hazardous materials, traffic and roads, Tribal interests and trust responsibilities, Chaco cultural landscape, Chaco Culture National Historic Park, public health and safety, visual resources, livestock grazing, geology and seismic activity. These issues, as well as those related to Free, Prior and Informed consent, United Nations Declaration on Rights of Indigenous Peoples, as well as landscape-wide sacred spaces are paramount to understanding all that is at stake in Greater Chaco.

The Bureau of Land Management must study alternative economic development opportunities that do not endanger the land or lives of the people. It is the duty of the Bureau of Land Management to consider a range of reasonable alternatives to balance oil and gas development with other multiple uses of the public lands and resources *before* the irreversible and irretrievable commitment of oil and gas resources to full-field development is made.² BLM must not continue to sacrifice Tribal communities living on the frontlines of resource extraction and should instead make efforts toward just transitions to democratized, equitable, clean and renewable energy and economic opportunities.

We call on you to put the needs of all people and communities above corporate profits and to honor the reasonable requests from official Tribal governments and hundreds of thousands of American citizens.

Signed:

¹ 43 U.S.C. § 1702(c).

² 42 U.S.C. §§ 4332(2)(C)(iii), (v) (requiring EIS to identify irreversible and irretrievable commitments of resources, 42 U.S.C. §4332(2)(E) (requiring consideration of alternatives where there are "unresolved conflicts concerning alternative uses of available resources").

Athens County (OH) Fracking Action
Network
Heather Cantino, Coordinator
33 Cable Lane Athens, OH 45701
Membership: 200

Chaco Alliance,
Anson Wright, Coordinator
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97221

Dooda (NO) Desert Rock Organization
Elouise Brown, President
PO Box 7838 Newcomb, NM 87455

Earthworks
Pete Dronkers, Southwest Circuit Rider
PO Box 1102 Durango, CO, 81302
Membership: 100,000

Food & Water Watch
Eleanor Bravo, National Pipeline
Campaign Manager
7804 Pan American Frwy E NE, #2
Albuquerque, NM 87107
Membership: 500,000

Forgotten People Organization
Louise Benally, Coordinator
Big Mountain, AZ

Frack Free Four Corners
Jenni Siri, Coordinator
133 Damon St. Belen, NM 87002
Membership: 7,578

Frack Free New Mexico / Frack Off
Greater Chaco
Rebecca Sobel, Coordinator
516 Alto St. Santa Fe, NM
Membership: 4,163

Great Old Broads for Wilderness
Shelley Silbert, Executive Director
PO Box 2924 Durango, CO 81302
Membership: 8,000

International Indigenous Youth Council
Lauren Howland, Coordinator
Membership: 33,282

Roadrunners Indivisible of Albuquerque
Elaine Brightwater and Pat Payne, Co-
Coordinators
1328 Luthy Cir. NE Albuquerque, NM
87112
Membership: 30

San Juan Citizens Alliance
Emily Bowie, Campaign Organizer
1309 East 3rd Ave., Suite 5 Durango, CO,
81301
Membership: 5,920

Sierra Club Rio Grande Chapter
David Coss, Chapter Chair
2215 Lead Ave. Albuquerque, NM 87106
Membership: 9,700

Southwest Environmental Center
Peter Sloan, Field Organizer
275 N Main St. Las Cruces, NM, 88001
Membership: 1,000

Southwest Native Cultures
Terry Sloan, Director
8205 Spain Rd. NE Suite 204
Albuquerque, NM 87109
Membership: 15

WildEarth Guardians
Jeremy Nichols, Climate & Energy
Program Director
516 Alto St. Santa Fe, NM 87501
Membership: 104,174

With previously stated support from:

350.org

350 New Mexico

4CornersIdleNoMore

Action Oriented

Amigos Bravos

Blancett Ranches

Bluewater Valley Downstream Alliance

Catholic Charities of Gallup

Campaign to END SACRIFICE ZONES

Center for Biological Diversity

Center for Diverse Landscapes

Center for Peace and Sustainability

Chaco Alliance

Citizens for Fair Rates and the
Environment

Clean Air Media

Climate Disobedience Center

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Counselor Chapter

Diné Citizens Against Ruining our
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Diné Pueblo Youth Alliance

Dooda (NO) Desert Rock Organization

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Fairbanks Climate Action Coalition

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Frack Free Four Corners

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Greenpeace

Idle No More Four Corners

Indigenous Environmental Network

Indigenous Life Ways

Inter Tribal Territories Recovery
Institute

I Stand With Standing Rock

Juntos New Mexico

Larry W Emerson, Diné activist, scholar,
farmer from Tsédaak'áán Community,
Diné Nation

Laguna-Acoma Coalition for a Safe
Environment

Livelihoods Knowledge Exchange
Network

Louise Benally, International Human &
Environmental Justice, Diné Nation

Lybrook Community Ministries

Max & Anna Levinson Foundation

Multicultural Alliance for a Safe
Environment (MASE)

MPG Consulting

Nageezi Chapter

Native Voters Alliance

Natural Resources Defense Council

New Energy Economy

New Mexico Climate Action

New Mexico Conference of Churches

New Mexico Environmental Law Center

New Mexico Interfaith Power and Light

New Mexico MoveOn.org

New Mexico River Keepers
New Mexico Story Power

New Mexico Wilderness Alliance

New Mexico Wildlife Federation

Northern New Mexico Climate Activists

Ojo Encino Chapter

Our Revolution New Mexico

Partnership for Earth Spirituality

Pavillion Area Concerned Citizens

PNM Shareholders for a Responsible
Future

Positive Energy Solar

Power Through Peace

Progressive Leadership Alliance of
Nevada

Pueblo Action Alliance

Pueblo Gathering for the Protection of
Greater Chaco

Rainforest Action Network

Red Warrior Camp, Standing Rock

Resolutions Unlimited

Rio Arriba Concerned Citizens

San Juan Citizens Alliance

Santa Fe Green Chamber of Commerce

Science & Environmental Health
Network

SEEDs of SW NM - Securing Economic
and Energy Democracy

Sierra Club	Tri-Chapter Health Impact Assessment Committee
Sierra Club Rio Grande Chapter	
SW Indigenous Uranium Forum	United Native Americans
Southwest Environmental Center	University of New Mexico
Southwest Native Cultures	U.S. Climate Plan
Stop Fracking the Rio Grande Valley	Wagon Mound Development Association
Stop the Frack Attack Advisory Council	Wasatch Rising Tide
Tewa Women United	Water Protectors of New Mexico
The Global Warming Express Climate Kids Think Tank	We Are One River
The Solstice Project	Western Environmental Law Center
To Nizhoni Ani	Wild Watershed
Torreon Chapter	WildEarth Guardians

CC:

U.S. Senator Tom Udall
U.S. Senator Martin Heinrich
U.S. Congressman Ben Ray Lujan
U.S. Congresswoman Michelle Lujan-Grisham
NM Governor Susana Martinez
Navajo Nation President Russell Begay
Navajo Nation Vice President Jonathan Nez
All Pueblo Council of Governor's Chairman Edward Torres