

Dear Director Barr,

An intensively industrial form of fossil fuel development, horizontal drilling and hydraulic fracturing (together “fracking”) has besieged the Greater Chaco region with truck traffic, oil tanks, pipelines, flares, and fracking equipment—putting communities, culture, and climate at risk. Much of this fracking is the result of more than 250 permits to drill issued by your office, without any plan for development and without adequate review. Such approvals must cease immediately.

The Greater Chaco region is one of America’s most important landscapes because of its unique environmental and cultural setting. It is home to ancestral and contemporary Native American tribes, including Navajo, or Diné (translated as “the people”), that rely on the land both to sustain their livelihoods and for traditional ceremonial practices. Until recently, the Bureau of Land Management (BLM) had dismissed fracking development as economically and technically infeasible, admitting it has never before fully analyzed the impacts of shale oil development in the Greater Chaco region.

In 2013, the BLM published a notice of its intent to amend the 2003 Farmington Field Office Resource Management Plan (RMP) to address the impacts of fracking in the Mancos Shale. More recently, BLM Director Neil Kornze admitted this process might take an additional three to four years to complete. Yet, despite not having a completed plan, BLM Farmington Field Office continues to permit full-field development of the Mancos Shale by approving hundreds of individual drilling permits without full environmental review. Between January 1, 2014 and March 13, 2015, BLM approved at least 265 APDs targeting the Mancos Shale.

Development of Mancos Shale oil in Greater Chaco puts the health and well being of citizens, especially the Diné, at significant risk. Hydraulic fracturing uses chemicals known to cause long-term harm to organs and body systems, including impacts to skin, eyes, sensory organs, the respiratory system, the gastrointestinal system, and the liver. Moreover, oil and gas operations result in elevated concentrations of health-damaging air pollutants such as volatile organic compounds (VOCs), aromatic hydrocarbons, particulate matter, and ground-level ozone. Fracking also results in elevated risk of water contamination with a significant potential to lead to adverse health outcomes.

These risks have already been actualized. According to expert testimony in federal court, fracking impacts related to BLM leasing approvals will be substantially greater than estimated in BLM’s 2003 RMP/EIS. Unstudied impacts just from permit approvals thus far include surface impacts to 1,253 acres; increased air pollutant emissions between 242% and 333%; 4,820 days of flaring or venting nitrogen and natural gas; incremental VOC and hazardous air pollutants emissions of 2,836 tons per year and 284 tons per year respectively; use of 241 million gallons of freshwater; production facility impacts involving several thousand more tanks and compressors largely built on public land; habitat fragmentation and loss of up to 31 times the area of physical disturbance (38,843 acres); and, truck traffic of 2,300 round trips per well – or an astonishing 554,300 total round trips. BLM has never analyzed the direct, indirect, or cumulative impacts of this development, nor allowed for public input in such analysis.

In the meantime, local community members are already suffering fracking-related impacts, including, for example, degradation of their use and enjoyment of Chaco Culture National Historical Park, the surrounding areas and cultural sites and resources; impacts to air quality and water quality; disturbance from flaring; impacts to the visual landscape and night skies; a reduction in solitude and quiet; impacts to the grazing of sheep and cattle; increased noise; increases in traffic; increases in violent crime; and decreased opportunities for spiritual experiences associated with the natural landscape and the holding of traditional cultural and ceremonial practices. Much of this environmental and social harm is irreparable.

Nonetheless, the BLM has leased thousands of acres and approved more than two hundred and sixty wells and associated infrastructure to drill into and frack in Greater Chaco. And recently, BLM began the process of approval for the proposed 134-mile “Piñon” oil pipeline, with a capacity to carry five times the volume of the area’s current production. Almost unbelievably, fracking is now taking place across the road from Lybrook Elementary School. BLM is rubber-stamping fracking development despite inadequate consultation with the public in general and with Navajo Chapter Houses in particular.

Once informed and given opportunity to participate, citizens have responded in force. The Pipeline’s scoping period drew over 250 concerned citizens at public meetings and over 30,000 public comments. Petitions supporting a moratorium on Greater Chaco fracking have drawn over 200,000 signatures. Recently, Senators Udall and Heinrich and Congressman Luján called on Interior Secretary Jewell to send high-level representatives to the Greater Chaco region to hear about the many problems fracking is causing here. Senator Udall further secured a commitment from Director Kornze that this area will receive his attention and will be protected from the ravages of fracking.

We, the undersigned, renew our call for an immediate moratorium on all permitting of drilling, leasing of further lands for drilling, and approval of related infrastructure, including the Piñon Pipeline, until the BLM completes its study of impacts related to fracking in the Greater Chaco region and such development has received approval in the pending RMP. Further, given the three to four years of study identified by Director Kornze as still remaining before RMP approval, we demand an assurance that RMP review will include: 1) a comprehensive study of the impacts of oil and gas development on community health, the environment, and cultural resources, and 2) a study of the economics of an alternative energy development scenario that includes a just transition to a clean energy future for the Greater Chaco region.

Signed:

**Caretakers of Land, Elders, Children  
(CLEC) Allotment Landowners**

**Counselor Chapter**

**Diné Citizens Against Ruining the  
Environment**

**Dooda (NO) Desert Rock**

**Dooda Fracking**

**Four Corners Idle No More**

**Ojo Encino Chapter**

**Southwest Indigenous Uranium Forum**

**Torreon Chapter**

**United Native Americans**

**Amigos Bravos**

**Center for Biological Diversity**

**Chaco Alliance**

**The Global Warming Express**

**Earth Care**

**Earthworks**

**Frack Free New Mexico**

**Food and Water Watch**

**New Mexico Interfaith Power and  
Light**

**New Mexico [MoveOn.org](http://MoveOn.org)**

**New Energy Economy**

**Natural Resources Defense Council**

**Positive Energy Solar**

**Rainforest Action Network**

**Rio Arriba Concerned Citizens**

**Rio Grande Chapter of Sierra Club**

**Rogoff Dental Group**

**San Juan Citizens Alliance**

**Western Environmental Law Center**

**WildEarth Guardians**

**Women Donors Network**