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## BLM Resource Management Plan Amendment

### *Public Comment Talking Points*

#### OVERVIEW

The Bureau of Land Management (BLM) Farmington Field Office (FFO) is amending its 2003 Resource Management Plan (RMP) to include horizontal drilling and new industrialized fracking technologies in Greater Chaco. The process is reopened for official public comment until December 20, 2016. This is a major opportunity to have our voices heard and speak out for an **end to new leasing** of northwest New Mexico's public lands.

#### BACKGROUND

**91% of our public lands in Northwest New Mexico are leased to oil and gas development, with over 40,000 wells.** This existing development fragments the landscape, pollutes our air and water resources, and puts local communities at risk. Now, additional development, using new industrialized fracking technologies, threatens to expand these impacts on the region.

The BLM FFO directly controls most of these lands, and is responsible for leasing and drilling authorizations for all federal minerals. The BLM is required by its "multiple use mandate" to balance the uses of our public lands, and is not supposed to elevate oil and gas above other uses such as conservation, environmental values, or recreation. However, **for decades BLM has prioritized oil and gas production at the expense of all other land uses.**

Much of the last 9% of unleased land is in Greater Chaco. **The BLM FFO admits to never analyzing the impacts of new industrialized fracking across this landscape** and is actively amending its office-wide resource management plan in response. Yet, the **BLM continues leasing minerals under public and tribal lands in the region for fracking and has approved more than 365 wells and counting, as well as new pipelines and other infrastructure.**

**With 91% of public lands already leased, we are past the point where any balance can be achieved. Balance in this case requires ending all new leasing and starting to retire old leases. Immediate relief for the area is needed.** It is time to set aside and permanently protect the remaining 9%. The BLM must not endanger irreplaceable cultural resources with a practice that continually threatens the health and quality of life of local people.

## EXISTING IMPACTS

- Climate Change: In 2015, the United States joined with 194 other nations in the Paris Agreement, recognizing the imminent threat of climate change with the goal of “holding the increase in the global average temperature to well below 2°C above pre-industrial levels and pursuing efforts to limit the temperature increase to 1.5°C.” Continuing to drill in the San Juan Basin is in direct opposition to this national policy. To meet the 2°C threshold, 68% of *known reserves* -- fossil fuels already controlled by industry -- must remain in the ground.<sup>1</sup> In short, no additional fossil fuel resources can be leased if we stand any chance of avoiding catastrophic climate change.
  - Four Corners Methane Hotspot: The Four Corners Hotspot is the largest concentration of atmospheric methane in the U.S., directly over the San Juan Basin. Methane, a powerful greenhouse gas, is 87 times stronger than carbon dioxide as a climate pollutant. A NASA study released in August 2016 confirmed that the vast majority of the hotspot methane originates from oil and gas infrastructure.<sup>2</sup>
- Community Impacts: Development of oil and gas wells requires thousands of truck trips per well. Traffic, noise, and light intrude on the daily lives of residents, negatively impact local wildlife, and degrade the region’s landscape.
  - Spills: According to data from the New Mexico Oil Conservation Division, there were 1,477 reported spills in 2015, an 87% increase since 2011, and an average of 4 spills per day.<sup>3</sup>
  - WPX Explosion: In July 2016, a well pad near the Nageezi Chapter House and in Greater Chaco exploded and burned for days, killing livestock and requiring local residents to evacuate. Insufficient emergency planning put local community members at great risk.<sup>4</sup>
- Public Health: Smog and regional haze resulting from oil and gas development pose serious threats to local communities, especially to children and elderly with respiratory complications. Additional pollutants, including BTEX compounds like benzene and formaldehyde, significantly increase (nearly double) the likelihood that people living with a half mile of an oil or gas pad will get cancer.<sup>5</sup>
  - Smog: In 2016, San Juan County got an "F" from the American Lung Association for ground-level ozone (smog) pollution. Smog aggressively reacts with lung tissue, posing a serious health threat to children and those suffering from asthma. In New Mexico, smog from oil and gas pollution causes over 12,000 asthma attacks in children each year.<sup>6</sup>
  - Regional Haze: Oil and gas development releases airborne particulate matter and gases that form regional haze. Haze blocks light, reduces visibility and endangers public health.

## RMP-A REQUESTS

### 1. **Moratorium**

The BLM should impose a moratorium on all oil and gas leasing and drilling approvals pending completion of the Resource Management Plan Amendment (RMP-A), as is required by federal

law. Moving forward with new oil and gas leasing before planning is complete will inevitably influence, and likely predetermine, the outcome of the RMP-A.

**2. No New Leasing**

The BLM Farmington Field Office has already leased 91% of the lands it manages to oil and gas development. The BLM is required by the multiple-use-mandate to **balance** uses of public lands. We are past the point where any balance can be achieved. BLM must withdraw all remaining unleased mineral resources from leasing eligibility. Withdrawal will also protect communities, cultural resources, renewable energy resources, and the environment from further harm and degradation.

**3. Lease Retirement**

Just taking the last 9% of unleased public lands off the table will not fulfill the multiple-use-mandate. To restore even a semblance of balance, existing, non-producing oil and gas leases must be retired, making these public lands available for other resource uses and conservation.

**4. Cultural, Environmental, and Public Health Safeguards**

To assure suitable protections for the region, the BLM FFO must comprehensively analyze impacts of existing and potential oil and gas development on public health, local quality of life, cultural resources, environmental resources, and climate change.

**5. Tribal Consultation**

The BLM must conduct tribal consultation at every stage of decision-making. Tribal consultation must not be limited to a single conversation with Navajo Nation Government. Indigenous peoples with interest in Greater Chaco are not limited to the Navajo Tribal Council government. Therefore, review and consultation must extend to all Tribes who trace lineage and sacred lands to Chaco culture as well as traditional Navajo Chapters.

**ENDNOTES:**

<sup>1</sup> Greg Muttitt, et al., *The Sky's Limit: Why the Paris Climate Goals Require a Managed Decline of Fossil Fuel Production*, Oil Change International (Sept. 2016) at 6.

<sup>2</sup> Methane "hot spot" over Four Corners linked to oil, gas production sites," *The Denver Post*, August 16, 2016, [Available online](#).

<sup>3</sup> Center for Western Priorities. "Across New Mexico, Oil and Gas Companies Reported 1,477 Spills in 2015." (May 5, 2016).

<sup>4</sup> *Fire from New Mexico Fracking Site Explosion Keeps Burning Three Days Later*," *Think Progress*, July 14, 2016. [Available online](#).

<sup>5</sup> McKenzie, et al. "Human health risk assessment of air emissions from development of unconventional natural gas resource." *Science of the Total Environment*. (Sept 15, 2011).

<sup>6</sup> "New Mexico." Oil and Gas Threat Map. [Available online](#).