Ohio Valley Environmental Coalition
Supporting Organized Voices and Empowered Communities Since 1987
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Karen Mouritsen
State Director
Bureau of Land Management
Eastern States Office
20 M Street SE, Suite 950
Washington, D.C. 20003

Re: Protest of the September 21, 2017 Competitive Oil and Gas Lease Sale, Wayne National Forest

Dear Director Mouritsen:

I hereby file this Protest of the Bureau of Land Management's ("BLM") planned September 2017 Competitive Oil and Gas Lease Sale and the programmatic Final Environmental Assessment for oil and gas leasing in the Wayne National Forest, Marietta Unit of the Athens Ranger District, Monroe County, Ohio- 6 Parcels covering 191.71 acres available for lease.

ES-001
Parcel Info
View on Map Monroe County, OH
T4N, R5W, Ohio River Survey
Sec. 7: SENE

Acres: 39.68 Opening bid: $2/acre Open for bidding:
09/21/17 7:00 AM CDT
ES-002
Parcel Info
View on Map Monroe County, OH
T2N, R4W, Ohio River Survey
Sec. 15: NENE, W2SENE, Part SWNE

Acres: 97.72 Opening bid: $2/acre Open for bidding:
09/21/17 7:02 AM CDT
ES-003
Parcel Info
View on Map Monroe County, OH
T2N, R4W, Ohio River Survey
Sec. 15: Part NESE

Acres: 4.16

PROTEST
I. Protesting Party: Contact Information and Interests
This Protest is filed on behalf of OVEC, the Ohio Valley Environmental Coalition, by:

Vivian Stockman, vice director
OVEC
PO Box 6753
Huntington, WV 25773

These comments are also filed on behalf of the Concerned Citizens Coalition of Roane County (WV).

I personally have recently visited a Wayne National Forest campground and intend to do so in the future. I believe some of our (OVEC's) members enjoy the Wayne Forest for recreational purposes.

II. Statement of Reasons as to Why the Proposed Lease Sale Is Unlawful:
BLM's proposed decision to lease the parcels listed above is substantively and procedurally flawed for the reasons discussed below:

1-No Environmental Impact Statement has been completed!

2-BLM has failed to properly study the impacts of potential hydraulic fracturing (fracking) in the Wayne National Forest on local and regional air quality.

3-BLM has failed to properly assess and account for the impacts of hydraulic fracturing on the health of neighbors of the Wayne National Forest. Studies have found residents living near [within two miles] wells using the hydraulic fracturing method experience some or all of these problems: higher rates of cancer, endocrine disrupting activity, headaches, nausea and vomiting, eye and throat irritation, and lower birthweights in newborns.

4-BLM has failed to consider impacts on rare, threatened and endangered species whose habitat is the Wayne National Forest.

5-BLM has not adequately considered potential increases in seismic activity due to fracking-related activities in the Wayne National Forest.

6-BLM has not properly assessed the impacts to ground water and surface water resources as required under NEPA (federal law). Recent federal studies demonstrate that surface water can be contaminated as a result of deep-well underground wastewater disposal.

7-BLM has not properly considered the impacts methane releases from potential fracking operations in the Wayne National Forest could have in contributing to disruptive climate change.

8-BLM has not properly considered what impacts fracking-related activity could have on neighbors to the forest (including greatly increased large-truck traffic and is associated impacts on infrastructure, as well as air and noise pollution), as well as the Ohio River, drinking water source for three to five million people.

Please do not go forward with this proposed lease sale. Not only is it unlawful, it is also gravely unwise for the current and future health of the Wayne National Forest and its neighbors.

Thank you for your consideration.

Vivian Stockman