

**Powder River Basin Resource Council
Buckeye Forest Council * Center for Biological Diversity
Earthworks Oil & Gas Accountability Project * Natural Resources Defense Council
Newton County Wildlife Association * Northern Plains Resource Council
Ohio Sierra Club Forest and Public Lands Committee * San Juan Citizens Alliance
Western Colorado Congress * Western Organization of Resource Councils
Wyoming Outdoor Council**

Via first-class and electronic mail

August 7, 2012

Acting Director Mike Pool
Bureau of Land Management
1849 C Street N.W., Rm. 5665
Washington, D.C. 20240
mpool@blm.gov

Dear Director Pool:

We are writing to request your immediate attention to BLM field offices across the country that are planning for and approving horizontal and directional oil and gas wells without the necessary environmental impacts analysis pursuant to the National Environmental Policy Act (NEPA). This activity requires national oversight. We ask that you issue a national instruction memorandum to field offices to place a hold on leasing and permitting in areas where directional and horizontal drilling and hydraulic fracturing are reasonably foreseeable until the necessary NEPA analysis is completed.

As you know, there is a boom going on across the U.S. of oil and gas wells in new formations only now accessible because of advancements in hydraulic fracturing techniques. These wells and the activities needed to support their construction and fracturing are significantly different than predecessor wells, with horizontal and directional drilling into deep formations and new hydraulic fracturing techniques. These newer methods present a number of substantial and unique environmental and community impacts that must be thoroughly considered in a relevant NEPA analysis, including increased water consumption and quality impacts, more truck traffic, socio-economic impacts, greater air quality emissions, cross-contamination of subsurface aquifers from abandoned and idle oil and gas wells, generation of potentially toxic waste, and other issues. Unfortunately, BLM field offices have not kept up with this recent boom and we are not aware of any that have carried out the requisite analysis under NEPA of these significant impacts. They have also not fully considered the human health impacts of these activities, even though the activities increasingly intersect with areas where people live and work and where children attend school.

This also means that BLM field offices have not analyzed alternatives or measures designed to mitigate these impacts. Instead, field offices are attempting to substitute outdated NEPA analysis conducted for other types of wells – analysis that in most cases is largely irrelevant to the type of drilling and production now being permitted.

This is not an isolated problem. Field offices across the nation have failed in their duties under NEPA to analyze the impacts of deep hydraulically fractured wells. We are aware of this occurring in Wyoming, Colorado, North Dakota, Montana, New Mexico, California, Arkansas, Alabama, Louisiana, Mississippi, and Ohio. We ask you to take immediate action to correct this serious problem and ensure that the BLM complies with the letter and spirit of our nation's paramount environmental law.

Sincerely,



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Attachments (via hard copy only): Request for State Director Review of the Simba & Mufasa Wells
in the Powder River Basin, Wyoming (with exhibits)