United States Department of the Interior

NATIONAL PARK SERVICE
Hovenweep and Natural Bridges National Monuments
HC 60 Box 1
Lake Powell, Utah 84533

IN REPLY REFER TO:

December 13, 2018

Sheri Wysong
Fluid Mineral Leasing Coordinator
Bureau of Land Management
Utah State Office
440 West 200 South, Suite 500
Salt Lake City, Utah 84101-1434

Dear Ms. Wysong;

Thank you for the opportunity to provide comments on the Determination of NEPA Adequacy (Determination) document for the proposed March 2019 oil and gas lease sale in the Monticello Field Office (DOI-BLM-UT-Y020-2019-0004-DNA). The 19 parcels that will be offered for lease are between approximately 4.5 and 21 miles generally northwest from Hovenweep National Monument (Hovenweep) and have the potential to affect resources important to Hovenweep. The National Park Service believes the Determination does not adequately address several concerns related to resource protection at Hovenweep National Monument, as described below. Therefore, we respectfully request the Bureau of Land Management to withdraw the subject parcels from the March 2019 lease sale.

Oil and gas exploration and production activities that may result from the sale of lease parcels have the potential to cause direct, indirect, and cumulative effects on air quality and air quality related values (deposition and visibility) that have implications for resource conditions in Hovenweep and surrounding areas. Because ozone concentrations in the region are approaching National Ambient Air Quality Standards, effects of oil and gas activities on ozone formation are of particular concern. Consistent with the Interagency Memorandum of Understanding concerning air quality analyses and mitigation for federal oil and gas decisions, we ask that BLM consult with the NPS Air Resources Division and other members of the Utah air resources technical advisory group in determining the most appropriate type of air quality analyses to conduct if these parcels are leased and subsequently developed..

We are concerned about the proliferation of pads and roads associated with potential future exploration and production activities enabled by the proposed lease sale. Construction of well pads and associated increases in vehicular traffic would likely result in increased emissions of fugitive dust from unpaved pads and roads. Dust emissions have the potential to impact air quality and air quality related values such as regional haze and visibility. Cumulatively, dust emissions also have the potential to influence streamflow and other hydrologic processes through downwind effects on mountain snow cover.

We are concerned about an increase in earth vibrations by heavy vehicle traffic traveling at speed on rough paved and unpaved roads in the immediate vicinity of the Hovenweep units. Vibrations from heavy vehicle traffic have been shown to affect historic structures. We recommend that heavy vehicle traffic routes to any parcels that may be leased be restricted to distances greater than one mile from any of the Hovenweep units.

Visual resources of concern to the NPS include scenic views impacted by regional haze, and dark night skies seen from Hovenweep. In order to protect views to the north and northwest, we suggest adding stipulation UT-S-157 (No Surface Occupancy/Controlled Surface Use/Timing Limitation—Visual Resources) to parcels 417, 418, and 419. This will protect the character of the landscape in accordance with the parcels' inventoried visual resource classes. We note that Hovenweep (and Natural Bridges National Monument and Canyonlands National Park are all certified as International Dark Sky Parks [see http://www.darksky.org/night-sky-conservation/dark-sky-parks]).

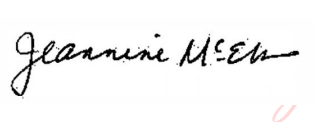
We are concerned about potential impacts of oil and gas exploration and drilling activities on natural soundscape conditions experienced in Hovenweep. Several parcels (417, 418, 419, and 424) under consideration for this lease sale are located about five miles away from Hovenweep. Noise propagation modeling conducted in support of the Moab Master Leasing Plan indicated that noise generated by unmitigated drilling operations can be heard more than six miles away from the source under some conditions.

We also are concerned about potential impacts of exploration and development activities on water resources in Hovenweep. The Monument depends on groundwater for all administrative and visitor uses, and development of groundwater resources for oil and gas extraction in the area has the potential to affect the quantity and quality of Hovenweep's groundwater source. Furthermore, hydraulic fracturing associated with oil and gas production has the potential to introduce contaminants into groundwater systems. Therefore, we request that BLM consult with the US Geological Survey and the State of Utah regarding possible effects of oil and gas production on water quantity and quality in the Hovenweep area. We suggest that BLM include a lease notice informing all potential lessees that protection of groundwater quantity and quality are of paramount importance in the region and that operators will be required to conform to best management practices and document efforts to protect water resources.

Finally, in addition to the groundwater quality and quantity issues, we are concerned about the potential for earthquakes that could result from lubrication of faults, bedding planes, formation contacts, and other subsurface geologic structures by injection of fluids during hydraulic fracturing or injection of produced water. Prehistoric cultural structures at Hovenweep would be very susceptible to even extremely slight earth tremors initiated by fluid injection.

If you have any questions regarding these scoping comments, please contact me at 435-692-1234 ext. 15 or jeannine_mcelveen@nps.gov, or you may contact the Southeast Utah Group Chief of Resource Stewardship and Science, Terry Fisk, at 435-719-2130 or terry_fisk@nps.gov.

Sincerely,



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Date: 2018.12.13 09:33:31 -07'00'

Jeannine McElveen
Superintendent, Hovenweep and Natural Bridges National Monuments

Cc: Superintendent, Southeast Utah Group, Moab, Utah