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December 3, 2019

Oil & Gas EIS Project

Mr. Robert Potts

Natural Resources and Planning Team Leader

National Forests and Grasslands in Texas

2221 North Raguet

Lufkin, Texas 75904

Dear Rob,

The Houston Regional Group and Lone Star Chapter of the Sierra Club (Sierra Club) provide this sixth set of comments for scoping for the U.S. Forest Service (FS) oil/gas leasing environmental impact statement (OGLEIS) under the National Environmental Policy Act (NEPA) for the National Forests and Grasslands in Texas (NFGT).

Although the official scoping period is over, the Sierra Club will continue to send the FS documents and articles that relate to the OGLE IS. The Sierra Club has been told in the past that although there is an official scoping comment period, that scoping extends from the beginning of the scoping comment period until the draft EIS is released.

There are three additional articles that the Sierra Club provides to the FS with this letter.

1. "Stock drop, layoffs rattle energy sector", Jordan Blum and Sergio Chapa, Houston Chronicle, December 3, 2019.

This article states "Skeptical investors; lackluster oil prices and the broad slowdown in drilling activity buffeted the Houston energy sector again Monday as oil field services companies cut more jobs and one exploration and production company's stock fell near its lowest level since the beginning of the century." "Boom and bust" oil/gas has economic consequences that are also negative, not just positive, and must be revealed in the OGLEIS analysis and EIS.

2. Natural gas producers in 'sad state', Jordan Blum, Houston Chronicle, December 2, 2019.

This article shows that not just oil, but natural gas is in a condition of oversupply. This can lead to reduced economic benefits and more flaring and thus more environmental impacts. The FS must analyze these conditions over the life of wells or fields and how this affects the NFGT and surrounding lands and communities.

3. "Oil and gas slow to adapt artificial intelligence", Chris Tomlinson, Houston Chronicle, December 2, 2019.

This columnist reports that artificial intelligence could create a new impetus for additional drilling. This could cause more environmental impacts in the future with more wells being drilled and developed.

4. "Some Texas Dems refusing oil money", Benjamin Wermund, Houston Chronicle, Washington Bureau,

November 30, 2019.

This article documents that some -Democratic politicians are refusing to take oil money to fund their campaigns. They suggest that the jobs that the oil industry provides are temporary. "That's the one thing about fossil fuel jobs ... They're not permanent jobs. They are temporary jobs."

5. "Oil sector posts worst decline in months", Catherine Ngai, Bloomberg News, Houston Chronicle, November 30, 2019.

This article documents that the oil sector is undergoing extreme economic changes in a downward direction as oversupply of oil continues. Additional disruptions of the oil market are considered possible in the future.

These articles emphasize the need for the FS to conduct a comprehensive economic, environmental, and social analysis of oil/gas shale and oil/gas energy. The NFGT must document all of the economic, environmental, and social factors, effects, and costs, both positive and negative, for oil/gas exploitation in a balanced analysis for the OGLEIS.

The Sierra Club appreciates this opportunity to provide these additional initial scoping comments about the OGLEIS. Thank you.

Sincerely,

Brandt Mannchen  
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