

## Oil and Gas EIS Project, National Forests and Grasslands in Texas

Please accept these comments in regard to the above project as it pertains to the National Forest adjacent to Lake Conroe. While the comments may be relevant to other areas, I have no knowledge of other areas so limit my comments accordingly.

It seems to me that the purpose of studying the impact of a lease is to develop information about the potential impact to affected stakeholders to measure against the anticipated value of a lease.

The evaluation done in 1996 and conclusion to refuse consent to lease NFGT lands from the BLM got it right. What has changed?

Impact:

I see two principal impacts. The first is the foreseeable impact resulting from lease operations. The second is the unforeseeable impact resulting from a catastrophic event.

Operational impact: Since the 1996 study, the population of the area that will be affected has grown materially. Any adverse effects on humans caused by operations will accordingly be greater. The growth of human population has also caused a reduction in wildlife sanctuary through development in formerly forested areas, with the result that the sanctuary of the Forest takes on added importance, such that any adverse consequence on wildlife will also be greater.

Unforeseen catastrophic impact: I know absolutely nothing about oil and gas exploration so will not comment on what possible catastrophic accidents might occur. Rather my comments reflect more of a risk reward analysis. On the risk side, there are literally millions of people who depend on the surface water of Lake Conroe and the ground water of the aquifers beneath the Forest for water, both for normal living and household use and industrial use. A catastrophic event would have disastrous consequences for millions of people. If there is even a remote possibility of a catastrophic event it seems to me that it would only be reasonable to run that risk if the reward were correspondingly high. Since 1996, technology in the oil and gas industry has dramatically changed, with the result that the United States is now one of the leading producers in the world. I question whether any minor incremental gain in supply, or any incidental additional revenue from a lease would offset the incredible tragedy of an unlikely catastrophic event.

In summary, it seems to me that the study is unnecessary, but if required by law, would be appropriately limited to an analysis of what has changed since the 1996 study, and an evaluation of the impact of a catastrophic event. It makes no sense to ignore the possibility of a catastrophic event. History is replete with the occurrence of unlikely catastrophic events.

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