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Comments: I would like to begin by saying that at the current time I am wholly opposed to the opening of areas of the Ruby Mountains to oil and gas leasing on many grounds, some of which are intended to be addressed by both the preordained limitations (such as where and what types of structures can be assembled, impacts on roadless area characteristics and cultural resources), and future environmental assessments (EA) (including effects on wildlife, ground water, soil contamination, etc.) which must be completed prior to commencement of any actual extraction.

First, while future studies may attempt to address these already considered areas of public concern, there is a distinct and high probability that the studies will either underestimate or maliciously obfuscate the impacts of the proposed leasing and extraction of resources. In addition to known factors of impact being underestimated, many unknown consequences often arise that were not considerations for the studies themselves.

"Environmental impact assessments are used in decision making of public authorities, industry and individuals. Surprisingly, environmental impacts of land use have been underestimated in the majority of the life cycle assessment studies"

(Original study: <https://link.springer.com/article/10.1007%2Fs11367-015-0947-y>)

Second, the aforementioned inadequacy of many EAs can lead to costly lawsuits, both from environmental groups and local land owners.

Can Landowners Pursue a Nuisance Claim... (includes citations for actual suits):

<http://www.rothmangordon.com/news/articles/marcellus-utica-and-other-shales/oil-and-gas-rights/can-a-landowner-pursue-a-nuisance-claim-against-an-oil-and-gas-company-for-its-activities/>

Wildearth Guardians vs. BLM (ongoing suit)

<http://www.documentcloud.org/documents/3034569-Westwide-Oil-Gas-Complaint.html>

Third, EAs may only center on the actual lease areas in question, and may not consider the compounding effects of those impacts on surrounding areas and ecosystems connected over a much larger area. They also likely will not take into account effects on air, noise, and light pollution on surrounding areas, which affect both natural ecosystems and quality of life for surrounding residents.

Forth, detrimental effects on local infrastructure, including roads, power, etc, need to be considered so as to not burden local residents of surrounding areas; wear and tear of existing roadways by heavy machinery, stress on connected power utilities (if using public infrastructure, additional air and noise pollution for energy generation if not), problems arising from rural areas not equipped to handle extra traffic, etc.

Fifth, due to recent deregulation companies granted leases for various resource extraction activities are not required to have a reserve of capital for mitigation of unintended pollution, such as accidental spills of contaminated water or waste fluids. Without on-hand assets, cleanup of such incidents falls upon taxpayers, both local and throughout the country, while any actual actions to clean are often indefinitely delayed, causing undue burden on local communities and environments.

Sixth, there are numerous dangers associated with abandoned oil and gas wells; ones that are already present and unknown, and new ones that will become abandoned in the future. First, there are dangers imposed by currently abandoned wells to future oil and gas extraction (Industrial Safety & Hygiene News: Old abandoned oil and gas wells pose new risks: <https://www.ishn.com/articles/102637-old-abandoned-oil-and-gas-wells-pose-new-risks>), plus many potential issues for future oil and gas wells (Society of Petroleum Engineers: Environmental Risk and Well Integrity of Plugged and Abandoned Wells).

Seventh, partially contained in above points, are unintended consequences of use of hydraulic fracturing fluids and waste including, but not limited to: unintended spills into surrounding watersheds; long term costs and risks associated with disposal of fluids in impoundment ponds or pits; stress on surrounding fault lines. Many of these issues will remain long after the leases for extraction have expired. Many 'best practices' for mitigating these issues are not mandated and are only 'recommendations' by the EPA.

EPA Archive Proper Management of Oil and Gas Exploration and Production Waste:

<https://archive.epa.gov/epawaste/nonhaz/industrial/special/web/html/hydrofrac.html>

Fracking: Unintended Consequences for Local Communities: <https://www.hsd.org/?view&did=798851>

Eighth, returns for the public are often far lower than expected and imbalanced unfairly in favor of individual companies profits. There are multiple factors involved in this, from companies leasing large amounts of land with no immediate intention for drilling (TWS Hoarders Report: <https://wilderness.org/blog/land-hoarders-oil-and-gas-companies-are-stockpiling-your-public-lands>), royalties paid on public lands vs. private lands being highly disparate, having not been updated for public lands for some time (CWP A Fair Share: The Case for Updating Oil and Gas Royalties on Our Public Land: [http://www.westernpriorities.org/wp-content/uploads/2015/06/Royalties-Report\\_update.pdf](http://www.westernpriorities.org/wp-content/uploads/2015/06/Royalties-Report_update.pdf)), to the costs associated falling on State and local lands with royalties going to Federal (PERC Divided Lands: State vs. Federal Management in the West: <https://www.perc.org/2015/03/03/divided-lands-state-vs-federal-management-in-the-west/>).

Ninth, there is the overall issue of the ongoing use of fossil fuels vs. renewable alternatives. Oil and gas as resources are in steady decline, as is their value for sale, which will directly impact returns on already undervalued royalties. Use of oil and gas contribute greatly to overall pollution, which is an expense shared by everyone. Especially in states such as Nevada, more consideration should be given to use of Public Lands for generation of renewable energy (CAP Using Public Lands for Public Goods: [https://cdn.americanprogress.org/wp-content/uploads/issues/2012/06/pdf/public\\_lands.pdf](https://cdn.americanprogress.org/wp-content/uploads/issues/2012/06/pdf/public_lands.pdf)).

As a concerned Nevada citizen not affiliated with any environmental groups and very little spare time, these issues are ones I could think of quickly and feel need to be addressed before oil and gas extraction take place on any public land. As a matter of national security, I also feel any oil and gas extraction from public land should be viewed as a safety net for The Strategic Petroleum Reserve as a means for 'energy independence' in the case of crisis, and not as something that should be placed on the open world market when no such crisis exists for the short term profit of individual corporations.

Thank you for your time and consideration.