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Comments:

I would first like to state that I personally oppose the leasing of National Forests and Grasslands in Texas for the purpose of oil and gas exploration and production.

There has been past history in which the true costs of leasing national forests for timber cutting were not fully evaluated, leading to flawed economic evaluations that timber leasing was financially beneficial.

In evaluating whether leasing of national forests and grasslands has a positive financial benefit, the Forest Service should look at all of the costs of O&G exploration and production and compare it to the projected lease auction and royalty income. Some of the costs include:

1. Forest Service personnel costs required to monitor actions of the lessees.
2. Physical loss of forests and grasslands to the footprint of access roads, drill site equipment, possible crude oil tank batteries, compressor stations, and possible construction of future crude oil or gas pipelines. This will cause loss of valuable natural resources and fragment the remaining habitat.
3. Transportation of the produced crude or gas will bring its own set of air quality impacts due to emissions from either truck traffic and/or pipeline construction. Increased road traffic will lead to increased road maintenance costs.
4. Additional traffic and noise and light pollution during exploration will diminish the peaceful recreational enjoyment of the national forests and grasslands and negatively affect wildlife.
5. If exploration activity is successful, O&G production would add increasing hydrocarbon emissions and diminished air quality for people and wildlife to the continuing negative impacts of traffic, noise, and light pollution. Air quality would be reduced by both by fugitive emissions and possible intentional flaring of gas.
6. Depending upon the area to be leased, water quality of nearby streams or ponds/lakes could be reduced by normal runoff from O&G operating sites or from spillage. Groundwater could also be vulnerable.
7. Heavy rainfall or flooding events could cause sheet flow to carry pollutants away from well sites or damage facilities so that spills occur.
8. The issues of handling of oilfield waste and salt water disposal must be considered, not only from their impacts as pollutants, but from the standpoint of possible increased earthquake frequency for salt water disposal wells.
9. Evaluation of the impact of possible increased water demands by lessees for O&G production. What is the value of the water lost from aquifers or other water sources if it affects the long-term health of the forests, grasslands, and wildlife?
10. It is to be expected that with the removal of desirable species and the insertion of disturbed soil sites into forests and grasslands, the stage will be set for the introduction of invasive species into previously undisturbed areas. What is the cost of the control of invasive species that will now have a foothold in areas scattered with the national forests and grasslands?
11. Evaluation of the costs of handling increased soil erosion from operations.

All of these costs should be evaluated in determining whether O&G leasing for a given areas is a financially sound decision.

Additionally, the updated NOAA Atlas 14 rainfall frequency data and its effect upon the mapped 100-year and 500-year floodplains should be used in evaluating the flood risk and likelihood of impact on O&G facilities when considering the costs of O&G leasing in given areas.

When evaluating costs, enhanced value should be attributed to those areas that preserve endangered or

threatened species or have unique ecological value, such as valuable prairie or watershed.