

June 4, 2010

Mike Poole, Acting Director
Bureau of Land Management
United States Department of the Interior
1849 C Street NW
Washington, DC 20240

Dear Mr. Poole,

We are writing in support of the Open Space Pilot Project, a unique public/private collaboration to bring innovative oil and gas development practices to northwestern New Mexico.

EARTHWORKS' Oil & Gas Accountability Project mission is to work with communities to prevent and reduce the impacts caused by oil and gas development. In the last decade we have led campaigns across the United States to pass precedent-setting laws and regulations protecting landowner rights, water and air quality and public health. Since 2003, our New Mexico Oil & Gas Network – a coalition of ranchers, homeowners and conservation groups – have succeed in passing the Surface Owner's Protection Act, permanently protecting the Valle Vidal from mineral extraction, and implementing best practices such as "closed-loop" or pitless drilling systems to protect groundwater.

In the past few years we have been following the progress of a new approach to drilling on the Devil's Spring Ranch in the San Juan Basin, which sits on top of one of North America's largest reserves of natural gas. Don and Jane Schreiber, the resident owners, were watching their ranch disappear – one well at a time. The Schreiber's were determined that better practices would not only help preserve the integrity and character of their ranch but also serve as a model for other regions of the country facing full-field oil and gas development.

The Open Space Pilot Project (OSPP) is a venture between the Devil's Spring Ranch, the BLM and the current operator, Conoco-Phillips. The basic concept is to drill new wells from existing well pads utilizing the existing road infrastructure. In other words - no new well pads, no new roads as well as an aggressive program to reclaim, restore and improve disturbed surface, including roads. The OSPP approach may potentially reduce the landscape footprint of future drilling activities by 90%.

There's a price tag attached but it's a bargain in terms of long-term pay-off. The OSPP is requesting \$352,000 through the BLM's Budget Planning System (Project Number 56755). The goals of the OSPP are to demonstrate that the impacts to the land will be dramatically reduced

through implementation of this project. We believe it is important to note that the costs are for monitoring and analyzing the project and will not result in ongoing expenses to the BLM to implement these better practices.

The OSPP will last 5 years and produce recommendations regarding the “twinning” of wells and directional drilling; long-term planning of wells/placement; and, implementing the “Zeedyk” road design to reduce erosion, run-off and long-term maintenance costs. 99% of the total project funding is complete, nearly a third of the OSPP wells have been drilled and a third of the roads have been completed.

This region of the country has had active oil and gas production for over 60 years and will likely see drilling for decades to come. The Basin has approximately 35,000 wells in production. The San Juan Basin is truly the Land of Enchantment – the sacred birthplace of the Navajo, world heritage sites such as Chaco Canyon, and gold medal trout fisheries. It is a landscape worth preserving. The social, economic and environmental benefits presented by the OSPP can renew the future of the San Juan Basin.

We enthusiastically support BLM funding of this project. Please don’t hesitate to contact us with any questions or comments.

Sincerely,



Jennifer Krill
Executive Director
EARTHWORKS



Gwen Lachelt
OGAP Director
EARTHWORKS

cc: Mr. Barack Obama, President, United States of America
Mr. Ken Salazar, Secretary, Department of the Interior
Mr. Ned Farquhar, Deputy Assistant Secretary, Land and Minerals Management,
Department of the Interior
Don and Jane Schreiber, Devil’s Spring Ranch, Open Space Pilot Project