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**From:** Bill Brown <bill@brownenviro.com>  
**Sent:** Monday, November 13, 2017 4:47 PM  
**To:** Sidney Hill  
**Subject:** Comments on the Proposed Sandoval County Oil and Gas Ordinance  
**Attachments:** Sandoval county oil and gas comments WJB.pdf

Here are my comments  
Thanks  
Bill Brown

November 13, 2017  
[shill@sandovalcountynm.gov](mailto:shill@sandovalcountynm.gov)

To: Attention: Sandoval County Commission  
Sandoval County, New Mexico

From: William Brown, P.G.  
15 Snow Peak Road  
Placitas, New Mexico 87043

**RE: Comments on the Proposed Sandoval County Oil and Gas Ordinance**

**Introduction**

The recently proposed "Stoddard Ordinance" in its current form poses a potentially serious threat to the long-term drinking water supply for the citizens of Sandoval County and potentially surrounding counties, pueblos, and municipalities, including the City of Albuquerque, the City Rio Rancho, and the Town of Bernalillo.

*As part of the Comprehensive Zoning Ordinance of the Sandoval County, NM " SECTION 2. PURPOSE.  
"The provisions of this Ordinance are designed to promote health and the general welfare of the County; to secure safety from fire, flood, and other dangers; to protect local water resources; to facilitate adequate provisions for transportation, water and wastewater systems, schools, parks and other community requirements; to conserve the value of property; and to provide for the compatible development of land and other natural resources in Sandoval County."*

The Stoddard Ordinance does not adequately meet the stated purposes of the Zoning Ordinance.

**Hydrogeologic Setting**

Sandoval County straddles several major geologic provinces including the San Juan Basin on the west and the Rio Grande Rift in the east. The San Juan basin is characterized by a broad depression with a relatively simple geologic environment.

The attached Figures 1 and 2 highlight the geologic setting in the eastern and more densely populated portions of the County. The Rio Grande Rift is characterized by numerous north-south trending normal faults which have resulted in the sediment infilled Rio Grande basin bounded by the uplifted Sandia mountains to the east. Tertiary and Quaternary basin fill sediments (shown in orange and brown on the attached maps), are the primary source of the Santa Fe aquifer. This aquifer provides drinking water for over half a million people in Sandoval, Bernalillo, and Valencia Counties. Proposed oil and gas exploration would penetrate these shallower aquifer zones and extend into the deeper Mesozoic and Paleozoic bedrock formations (shown in blues and greens on Figures 1 and 2). These underlying bedrock zones would likely be "fracked" as part of the oil and gas exploration/production well drilling process.

**Potential Threats to Water Supplies**

As can be seen on Figures 1 and 2, numerous faults are present in the vicinity of Bernalillo and Placitas areas. Implementation of Fracking in the proximity of these complicated and extensive fault zones poses a threat to overlying groundwater zones. Because of the highly complex large-scale nature of faulting in the area, the effects of fracking (and subsequent grouting) cannot be fully predicted. Horizontal fracking of bedrock adjacent to faults can result in facilitated migration of hydrocarbon contaminants (both oil and gas) along the fault zones to overlying groundwater zones. It should be noted that only the large-scale faults are shown on Figures 1 and 2; numerous smaller faults and fractures are present in the subsurface which are not shown on the maps/cross sections which further complicate the hydrogeology of the area.

Aquifer sensitivity to oil and gas production in the County generally increases from west to east. This is especially true in the vicinity of Placitas. Faulting in the Placitas area has also juxtaposed Mesozoic and Paleozoic (targets for oil-gas exploration) geologic formations against younger Tertiary and Quaternary Santa Fe aquifer formations. Fracking in these areas is even more problematic and potentially threatening to the areas water supply.

## Conclusions

Oil and gas exploration and production is not an exact science and many things can go wrong during drilling, fracking, and grouting processes in complex geologic environments. This has been documented at numerous locations throughout the United States.

The current rush to approve what is a short-sighted and flawed policy towards oil and gas production in Sandoval County oversimplifies a complex problem and ignores the long-term needs of the Citizens of Sandoval County. The County Planning and Zoning Director does not currently have the expertise or the resources to make decisions which may drastically affect the long-term water supply for thousands of people.

At a minimum, Sandoval County should specify wellhead protection areas limiting or preventing oil and gas production within portions of the County based on aquifer sensitivity and land use. This is especially true in the eastern portions of the County and Placitas in particular due to its highly complex geology and potential aquifer sensitivity. *No other water supply is available to the residents and municipalities in these critically sensitive areas.* Historically, Mitigation of oil-gas exploration contaminants to drinking water aquifers is cost-prohibitive and generally impractical. Long-term litigations are usually the result.

Implementation of a more comprehensive approach to oil and gas exploration in Sandoval County can effectively mitigate these potential problems.

William Brown, P.G. Hydrogeologist  
Placitas, NM



Dr. Peter A. Scholle  
Director and State Geologist

Dr. Paul W. Bauer  
Geologic Mapping  
Program Director

Geology of the Bernalillo and Placitas  
quadrangles, Sandoval County,  
New Mexico

Plate I of III.  
17 February 2000 Revision

Bernalillo quadrangle  
NMBMR OF-GM-16  
May 1998

Sean D. Connell<sup>1</sup>  
Placitas quadrangle  
NMBMR OF-GM-2  
June 1995

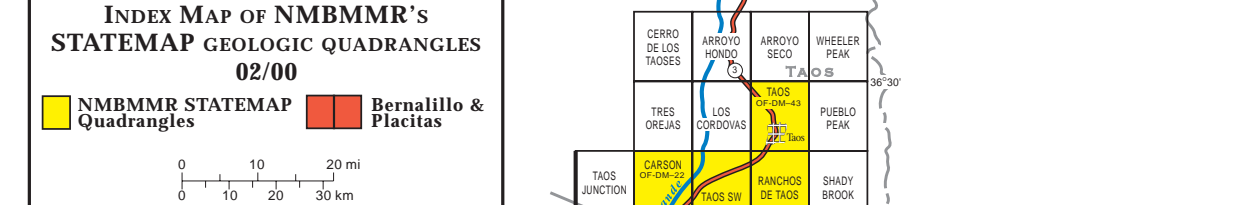
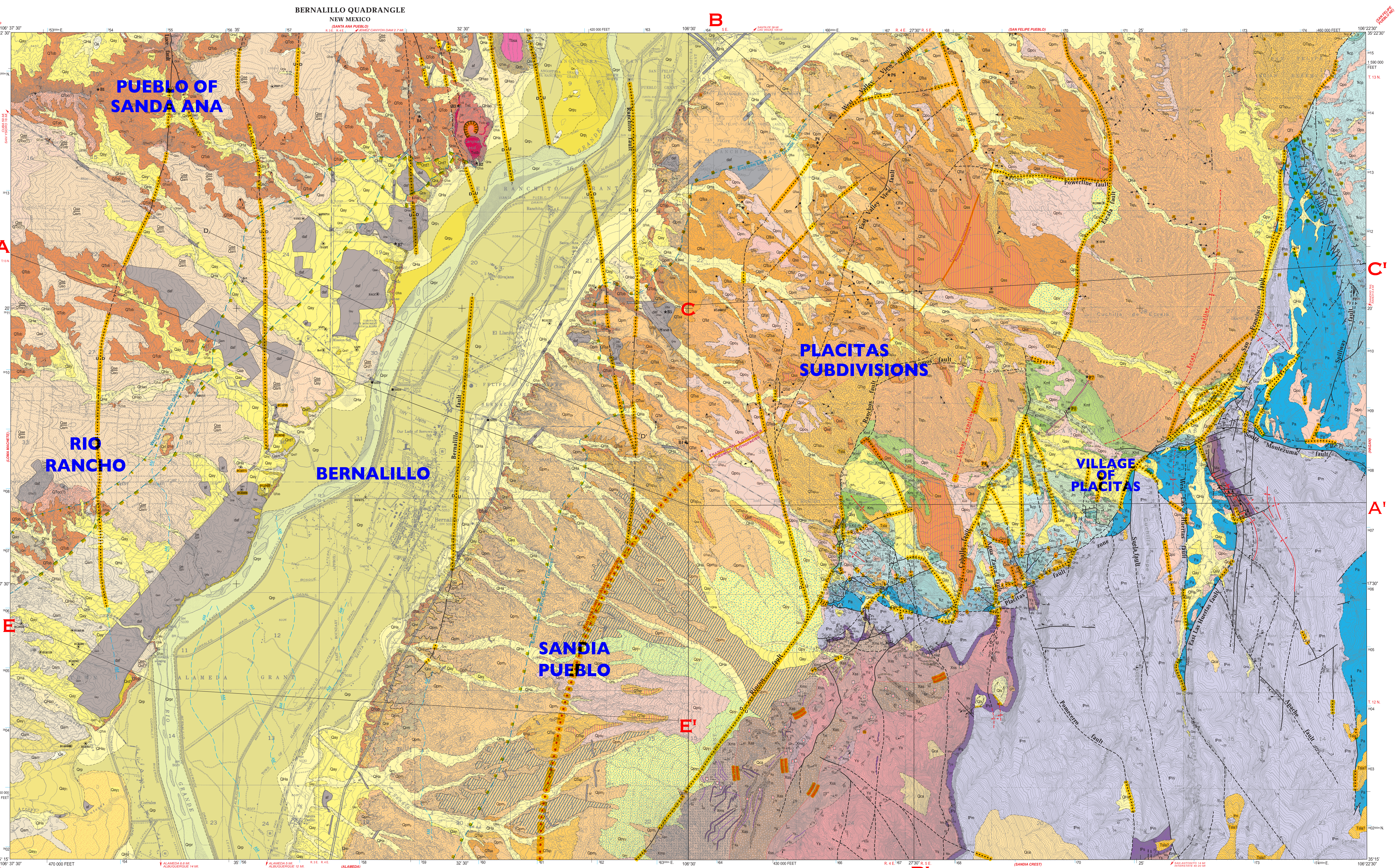
Sean D. Connell<sup>1</sup>, Steve M. Cather<sup>2</sup>, Bradley Ilg<sup>3</sup>,  
Karl E. Karlstrom<sup>3</sup>, Barbara Menno<sup>3</sup>, Mark Picha<sup>3</sup>,  
Chris Andronico<sup>3</sup>, Adam S. Read<sup>3</sup>, Paul W. Bauer<sup>2</sup>,  
and Peggy S. Johnson<sup>2</sup>

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Albuquerque Office, Albuquerque, NM 87106  
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David J. McCraw  
Mark M. Mansel  
Glen E. Jones  
Rebecca J. Titus  
Digital Cartography

EXPLANATION OF MAP SYMBOLS

- B — Location of geologic cross section
- Geologic contact—solid where exposed, dashed where approximately located, dotted where concealed
- Geologic contact interpreted location within units of and/or
- Approximate location of buried contact separating the ancestral Rio Grande axial fluvial deposits (Q7a) and piedmont deposits (Q7a) of the Upper Santa Fe Group on the Bernalillo quadrangle
- Approximate location of contacts separating the transitional (Q7b) and piedmont (Q7b) and (Q7c) deposits of the Upper Santa Fe Group on the Placitas quadrangle; dotted where concealed
- Normal fault—Tic showing dip; solid where exposed, dashed where approximately located, dotted where concealed, both on upthrown side, ball and bar added where reactivated as a Tertiary normal fault
- Reverse fault—Tic showing dip; solid where exposed, dashed where approximately located, dotted where concealed, both on upthrown side, ball and bar added where reactivated as a Tertiary normal fault
- Anticline—Trace of axial plane showing direction of plunge, dashed where approximately located, dotted where concealed, queried where inferred
- Syncline—Trace of axial plane showing direction of plunge, dashed where approximately located, dotted where concealed, queried where inferred
- Monocline with axial band—Trace of axial plane, short arrow on steeper band; dashed where approximately located, dotted where concealed, queried where inferred
- Monocline with syndinal band—Trace of axial plane, short arrow on steeper band; dashed where approximately located, dotted where concealed, queried where inferred
- Breccia or gouge zones
- Slickensides on fault
- Strike and dip of bedding, horizontal bedding
- Strike and dip of overturned bedding—ball indicates top of beds known from sedimentary structures
- Strike and dip of joint or fracture
- Strike and dip of S1 foliation
- Strike and dip of S2 foliation
- Strike and dip of magnetic foliation in granite defined by alignment of megacrysts
- Magnetic foliation in granite defined by mafic enclaves
- Trend and plunge of lineation—defined by elongate minerals or stretched grains
- Metamorphic facies—Showing boundary between diagnostic mineral assemblages
- Metamorphic minerals locality—[1] sillimanite; [2] andalusite; [3] sillimanite and K-feldspar; [4] sillimanite andalusite + K-feldspar and cordierite; [5] sillimanite andalusite + cordierite; [6] chlorite + muscovite + quartz
- Diastemite marker bed at top of Edith Formation (Dm)
- Paleoflow direction—measured azimuths of imbricated clasts
- Gravels with affinities to western basin-margin deposits
- Gravels with affinities to ancestral Rio Grande fluvial facies
- Gravels with affinities to eastern basin-margin deposits
- Approximate extent of buried fluvial terrace risers of the ancestral Rio Grande (post Santa Fe Group)—Hachured line: Buried terrace; Single hachured line: Edith Fm. (Double hachured line), Los Duranos Fm. (Triple hachured line), and Anasazi Fm. (quadruple hachured line)
- Aeromagnetic anomaly (Interpreted from U. S. Geological Survey and Soil Geosciences, Inc., 1998)
- Mine or quarry, old, shaft
- Direction of landslide failure and surface movement
- Basalt bed
- Approximate boundary of bluff ring
- Selected locality, Placitas (Pl), and Bernalillo (B) quadrangles
- Water-supply well, included abbreviation
- Exploratory or groundwater monitoring well, including abbreviation
- Exploratory geotechnical boring, including abbreviation
- Las Huertas geomorphic surface
- Del Agua geomorphic surface



Base from U.S. Geological Survey 1:50,000-scale maps, 1972-1973 North American datum, 100,000-foot grid based on New Mexico coordinate system, zone 13, shown in blue. Detailed land lines refer to appropriate basins. West boundaries of San Felipe Grant and Sandia Pueblo Grant adjacent to Rio Grande varied due to reallocation.

Scale: 1:24,000  
BERNALILLO CONTOUR INTERVAL 10 FEET  
PLACITAS CONTOUR INTERVAL 20 FEET  
NATIONAL GRID/TIC VERTICAL DATUM OF 1929

UTM GRID AND 1972 MAGNETIC NORTH DECLINATION AT CENTER OF SHEET

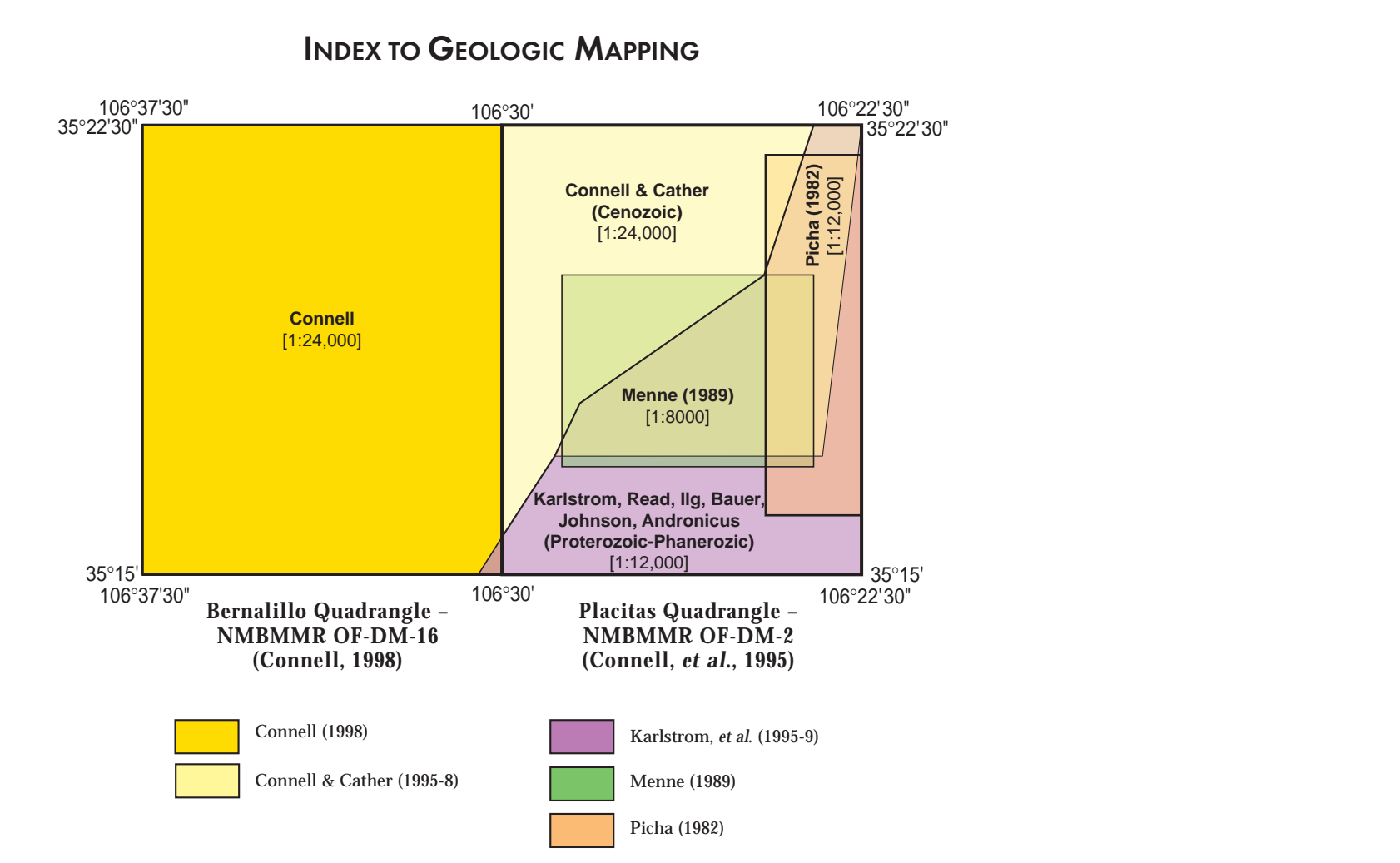
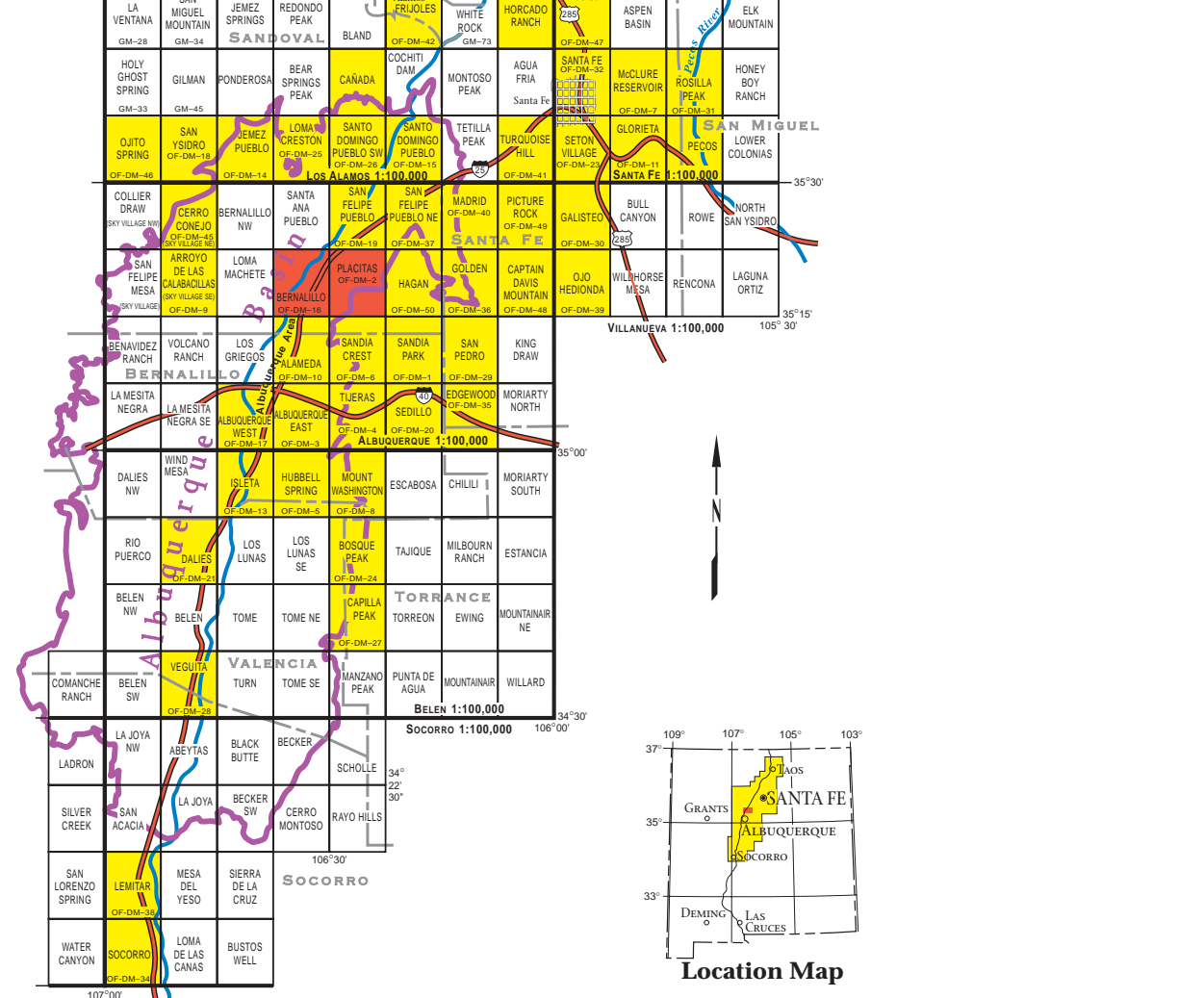
UTM GRID AND 1984 MAGNETIC NORTH DECLINATION AT CENTER OF SHEET

LOCATION OF QUADRANGLES

S. D. Connell, geologic mapping, correlation, photomicrography and regional structural interpretation based on borehole data analysis, well descriptions and correlations, and structural cross sections, geologic sketches to reveal of structures (at and off) interpreted from aerial photography.

D. J. McCraw, M. M. Mansel, and G. E. Jones, digital cartographic production.

Mapping of these quadrangles was funded by matching-funds grants from the 1995 and 1997 STATEMAP component of the National Cooperative Geologic Mapping Program coordinated by the U.S. Geological Survey and the New Mexico Bureau of Mines and Mineral Resources.



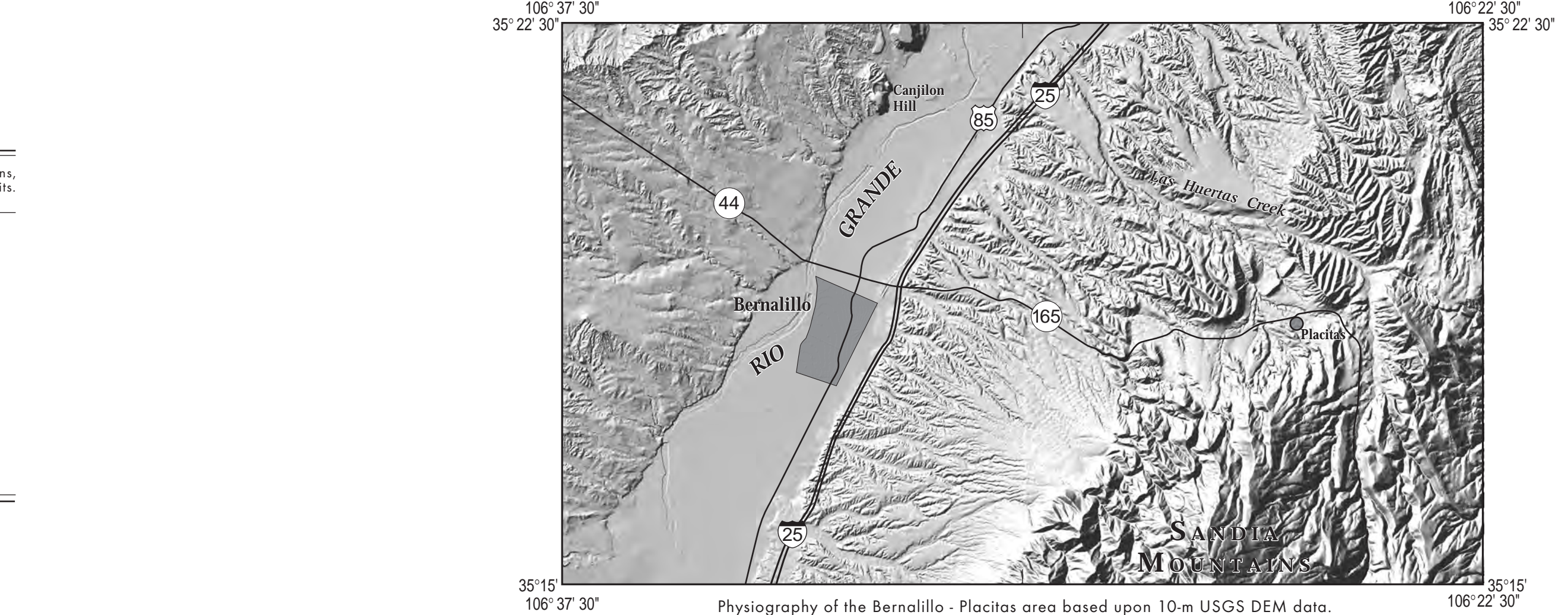
**COMMENTS TO MAP USERS**

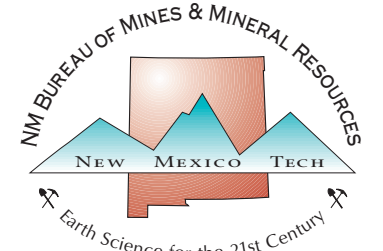
A geologic map graphically displays information on the distribution, nature, orientation and age relationships of rock and surficial units and the occurrence of structural features. These data are derived from geologic field mapping, compilation of published and unpublished work, analysis of borehole geophysics and wellcuttings, and photogeologic interpretation. Locations of geologic unit contacts are not surveyed; therefore, the accuracy of contact locations depends on the scale of mapping and the interpretation of the geologist(s). Portions of the study area were mapped at scales larger than depicted on the geologic map; therefore, the user should be aware of significant variations in map detail. Any enlargement of this map could cause misunderstanding in the detail of mapping and may result in erroneous interpretations. Site-specific conditions should be verified by detailed surface mapping or subsurface exploration.

This map has not been reviewed according to New Mexico Bureau of Mines and Mineral Resources standards. Revision of the map is likely because of the ongoing nature of work in the region (Please note the date of last modification in the upper right of Plate I). The contents of this map and associated report should not be considered final and complete until reviewed and published by the New Mexico Bureau of Mines and Mineral Resources. The views and conclusions contained in this document are those of the authors and should not be interpreted as necessarily representing the official policies, either as expressed or implied, of the State of New Mexico or the U.S. Government.

Tentative correlations of alluvial units in the study area, based upon stratigraphic relations, lithostratigraphic position, degree of soil development and physical character of units.

This Study	Connell (1996)	Lambert (1989)
Q1a, Q1aa	Q5	Q1a
Q1b, Q1bb	Q6	Q1b
Q1c, Q1cc	Q7	Q1c
Q1d, Q1dd	Q8	Q1d
Q1e, Q1ee	Q9	Q1e
Q1f, Q1ff	Q10	Q1f
Q1g, Q1gg	Q11	Q1g
Q1h, Q1hh	Q12	Q1h
Q1i, Q1ii	Q13	Q1i
Q1j, Q1jj	Q14	Q1j
Q1k, Q1kk	Q15	Q1k
Q1l, Q1ll	Q16	Q1l
Q1m, Q1mm	Q17	Q1m
Q1n, Q1nn	Q18	Q1n
Q1o, Q1oo	Q19	Q1o
Q1p, Q1pp	Q20	Q1p
Q1q, Q1qq	Q21	Q1q
Q1r, Q1rr	Q22	Q1r
Q1s, Q1ss	Q23	Q1s
Q1t, Q1tt	Q24	Q1t
Q1u, Q1uu	Q25	Q1u
Q1v, Q1vv	Q26	Q1v
Q1w, Q1ww	Q27	Q1w
Q1x, Q1xx	Q28	Q1x
Q1y, Q1yy	Q29	Q1y
Q1z, Q1zz	Q30	Q1z





Dr. Peter A. Scholle  
Director and State Geologist



Dr. Paul W. Bauer  
Geologic Mapping  
Program Director

**Geology of the Bernalillo and Placitas quadrangles, Sandoval County, New Mexico**

PLATE II of III.  
**GEOLOGIC CROSS SECTIONS**  
1:24,000

17 February 2000 Revision

Bernalillo quadrangle  
NMBMMR OF-DM-16  
May 1998

Sean D. Connell<sup>1</sup>

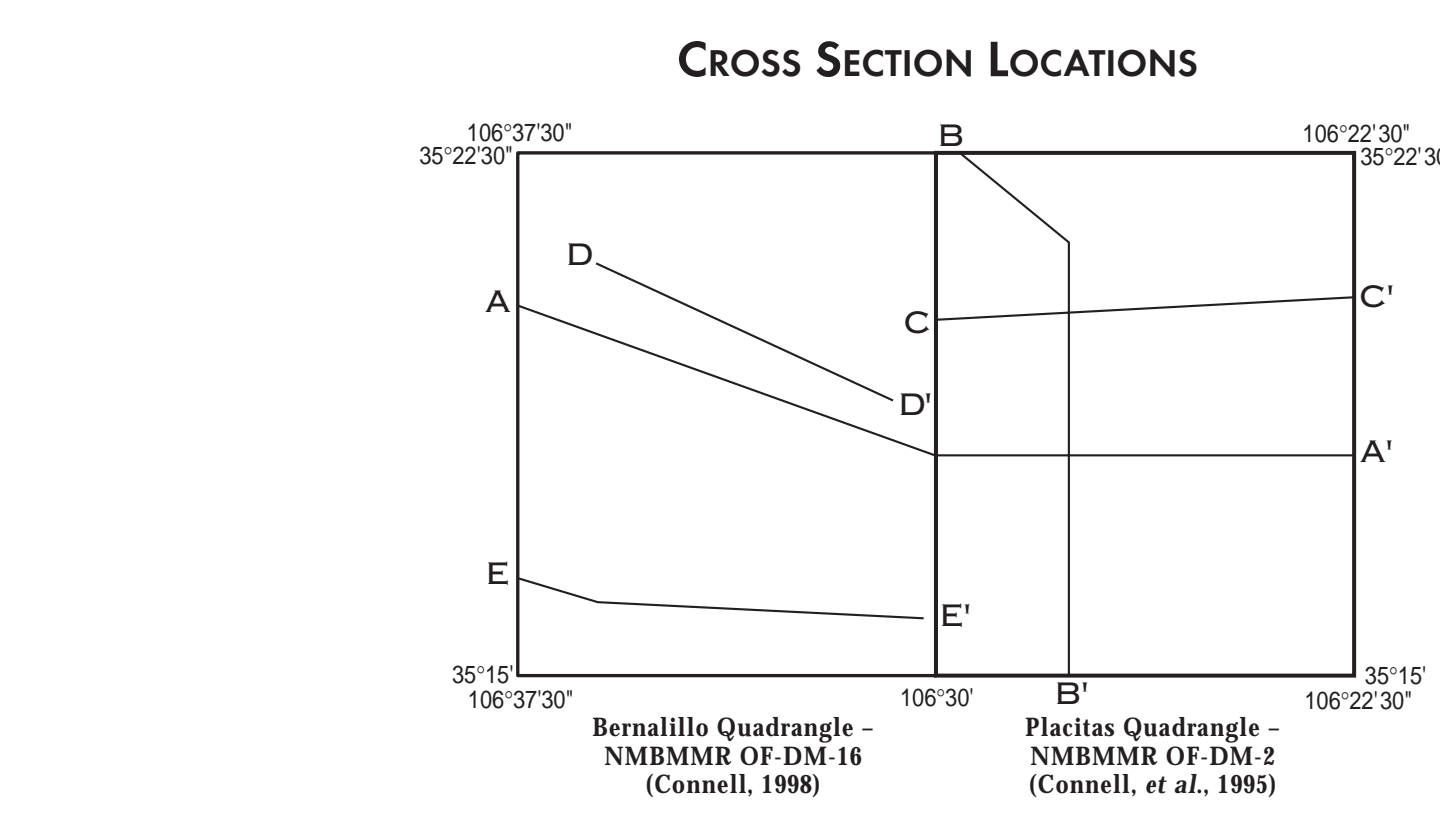
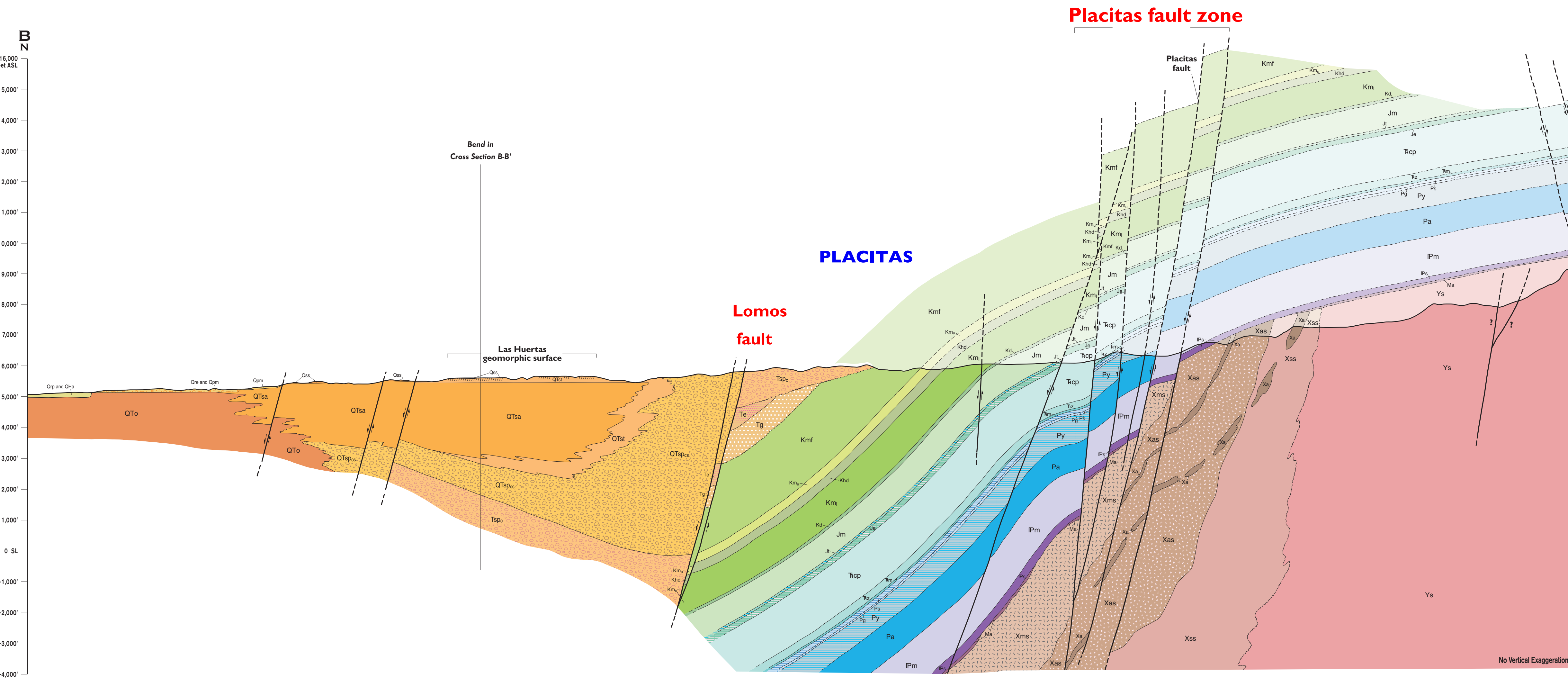
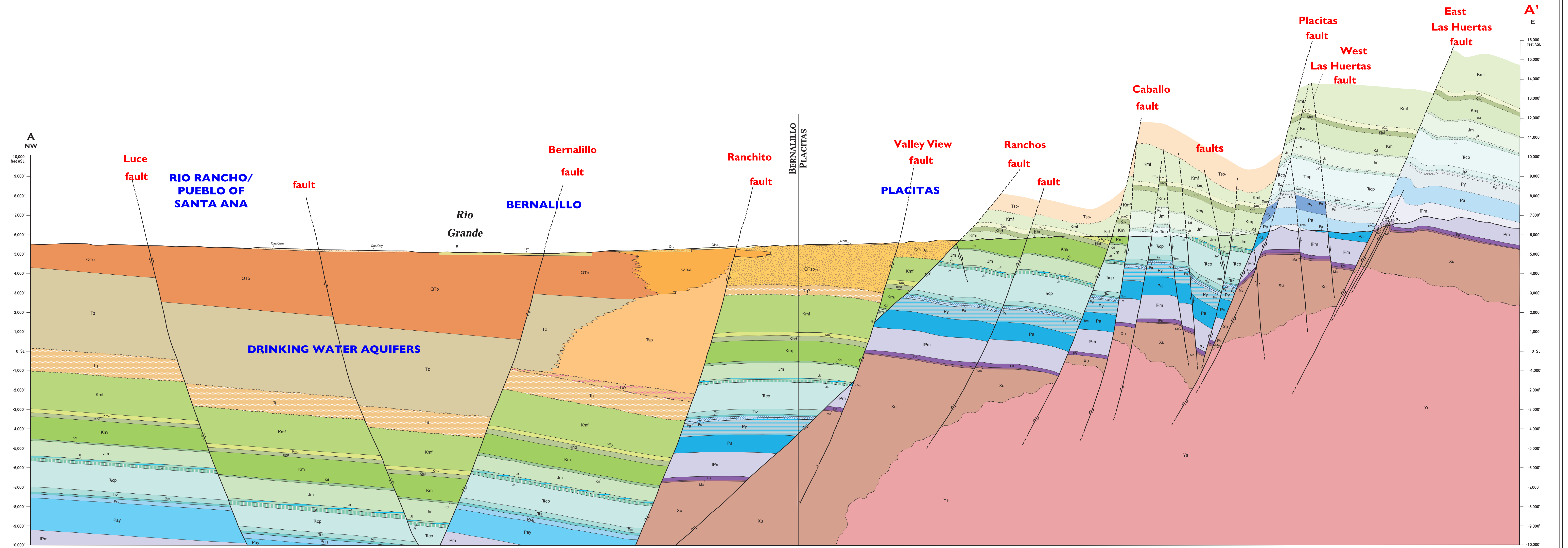
Placitas quadrangle  
NMBMMR OF-DM-2  
June 1995

Sean D. Connell<sup>1</sup>, Steve M. Cather<sup>2</sup>, Bradley Ilg<sup>3</sup>,  
Karl E. Karlstrom<sup>3</sup>, Barbara Menne<sup>3</sup>, Mark Picha<sup>3</sup>,  
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Cross sections are constructed based upon the interpretation of the authors made from geologic mapping, and available geophysical (regional gravity and aeromagnetic surveys), and subsurface (drillhole) data. Cross sections should be used as an aid to understanding the general geologic framework of the map area, and not be the sole source of information for use in locating or designing wells, buildings, roads, or other man-made structures.

