From: Jeffrey K Griffith < <u>JKGriffith@salud.unm.edu</u>>

Date: December 11, 2017 at 3:48:34 PM MST

To: "David J. Heil" <dheil@sandovalcountynm.gov>, "Don G. Chapman"

<dchapman@sandovalcountynm.gov>, "F. Kenneth Eichwald"

< keichwald@sandovalcountynm.gov >, "Dr. James Holden-Rhodes" < jholden-

<u>rhodes@sandovalcountynm.gov</u>>, Jay Block < <u>jblock@sandovalcountynm.gov</u>>, Michael

Springfield <mspringfield@sandovalcountynm.gov>

Subject: Vote NO on the Proposed Oil Drilling Ordinance in Sandoval County!!

Dear Sandoval County Commissioners,

We are writing to express our strongest opposition to the proposed Oil and Gas Drilling Ordinance in Sandoval County and to urge you to please vote against this proposed ordinance. Our opposition to the proposed ordinance is based on the following considerations.

- 1) Water is a scarce resource in NM. This fact is a primary tenet of the Sandoval County Comprehensive Plan, which states: "The conservation of water resources shall be a primary consideration for any new development or *changes in land use in Sandoval County*." Geological and hydrological mapping shows that the area extending from the East Mountains, west to Placitas and then down to Bernalillo, Santa Ana and Sandia Pueblos, and Rio Rancho is heavily faulted. This faulted band overrides the Albuquerque Basin and *an aquifer that supports a third of the state's population*. The locations where oil and gas companies want to drill into are in many cases actually in contact with the main drinking water aquifer[s], leading to potential contamination, serious health problems and reduced property values.
- 2) Important policy decisions should be data driven. Another policy "strategy" of the Sandoval County Comprehensive Plan, states: "Careful analysis of physical conditions such as soil capabilities, drainage patterns, and the like shall be considered to determine the areas most suitable for development and to ensure that new development does not negatively impact existing development or environmental conditions." Consistent with this view, on June 2, 2016, Chairman Chapman stated: "...the bottom line is that we want to make an informed decision, we are thinking about our constituents...It just can't be one facet of the energy spectrum... I know nothing about the Albuquerque Basin...[it must be] based on data and we are going to protect our most precious natural resources particularly ground water, something the public can sign off on.." Accordingly, on June 26, 2016, Sandoval County signed a Professional Service Agreement with New Mexico Institute of Technology and Mining. One of the key elements of

the Scope of Work was to "Provide assistance to County in understanding and managing water resource issues, particularly focusing on water quantity and quality. A document entitled Oil and Gas Resource Assessment of Sandoval County and Relationship of Potential Resources to Ground Water" was signed by the Director of Planning and Zoning on June 17, 2017. The summary of this document states: "Pertinent aspects of aquifers, including the distribution of aquifers prevalent in the county and depth to the base of the aquifer interval, will also be mapped in a reconnaissance manner. This in conjunction with projected depth to potentially productive oil and gas reservoirs will allow for assessment of the effect of oil and natural gas production on aguifers". Given the possible impact of the proposed ordinance on an aguifer that supports a third of the State's population, the results of New Mexico Tech's and similar studies, particularly "the effect of oil and natural gas production on aquifers" should be the prime determinant in considering this ordinance, not potential revenue. However, at the November 17 Meeting of the Sandoval County Commissioners, Chairman Chapman stated "[the study] is not a report that is meant to be the basis for this ordinance". If not, what was the purpose of the study and report? Has the New Mexico Tech study even been completed and evaluated? If so, what was the report's conclusion about potential effects of the ordinance on water quality and quantity? If not the NM Tech study, what is the basis for approving this ordinance?

- 2) Fracking requires large quantities of water. Data from FRACTRACKER indicates that each extant well in New Mexico required an average of 7.3 million gallons of water. To put this consumption in perspective, Rio Ranch had a population of about 96,000 in 2016 and average residential water consumption of 67 gallons/capita/day. At this rate, the water required for *each new gas/oil well* would provide more than 100% of the water Rio Rancho's residents consume in a day. Three hundred wells would require approximately the equivalent of 90% of Rio Rancho's annual residential water consumption! We simply do not have available the quantity of water fracking requires. Wells in the East Mountains are dropping steadily. For example data collected over the past several years show that wells in San Pedro Creek Estates are dropping an average of 3 ft every 6 months and many shallower wells have already gone dry. We were told by the former State Hydrologist that our water, in its totality, was already over-committed to the current residents. Where is the huge amount of water required for fracking going to come from?
- 3) Fracking also produces large quantities of waste water, and worse, in some instances toxic chemicals. What is the plan for disposing of this waste and preventing its contamination of the aquifer? Has an environmental impact study been conducted?

Commissioner Holden-Rhodes has summarized the issue best. He says in a letter, which outlines the complexity of the terrain across Sandoval County, especially in areas that overlap with the Albuquerque Basin aquifer, "It needs to be forcefully stated that any drilling in this area poses an extremely high risk for contamination of the drinking water aquifers."

The quality of our current well water is excellent. No financial gain to Sandoval County is worth compromising the quality and adequacy of our water supply, our property values and most importantly, the health of our families. We urge you to please vote against this poorly considered and potentially dangerous ordinance.

Respectfully,

Jeffrey and Barbara Griffith 24 Prado Vista Sandia Park