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**From:** Lilith Ren <lilith29ren@gmail.com>  
**Sent:** Tuesday, November 14, 2017 2:46 PM  
**To:** Sidney Hill  
**Cc:** Dick Ulmer; James Holden-Rhodes; Jay Block; Laura Robbins; Mike Neas  
**Subject:** Comments on the proposed Sandoval County Gas and Oil Drilling Ordinance

Dear Mr. Hill and Commissioners,

While I have written each Commissioner at least twice in past months with my comments about the sorely lacking current version of the proposed ordinance, I will briefly sum up my current chief concerns.

-The application process and decisions to accept applications lack rigor, and frankly, any skilled or knowledgeable oversight on the part of the county staff assigned the job.

-If oil or gas is found during the initial exploratory drilling then permits for ongoing drilling, extraction, and transport should be a separate and more extensive process, since the level of wear and tear on roads, the noise levels, and changes to air quality resulting from ongoing or extended drilling will be considerably more severe than from one initial test well.

-Baseline measures of noise and air quality should be made at every test sight before drilling begins. The ordinance lacks any meaningful standards against which the state or local citizenry can measure harmful changes. Without measures at the front end it is impossible to enforce any meaningful air quality or noise level changes much less judge when or if appropriate levels of restoration have been accomplished when the well is closed.

-Any company permitted to drill should be required to show proof of ongoing liability insurance or other legal bonds that will ensure the local government or citizens can be fully recompensed for damages caused by accidents, spills, or other unexpected harms. We require individual professionals and organizations to hold liability insurance in order to do business where there is far less expensive risk involved.

-The ordinance lacks measures to prevent the contamination of an aquifer nearly 1-million people depend on--the ABQ Aquifer. This poses a serious threat to our drinking water supply because the NM Oil Conservation Division (NMOCD) does not require companies to drill test wells for routine oil and gas drilling. The ordinance should require oil and gas companies to perform baseline groundwater testing and post-drilling monitoring.

My preference is that this proposed ordinance be tabled until the study commissioned by the county (and for which we are paying \$65,000) is received, read carefully, and incorporated into this ordinance. Further, I would recommend the changes proposed in the document know as the Citizens' Committee Draft Ordinance submitted to County earlier this fall be incorporated.

Thank you for considering my comments.

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"We must strive as best we can to attain decency, clarity and proximate justice in an ambiguous world."  
Reinhold Niebuhr