Re: Oil and gas extraction authorizations by the Bureau of Land Management threaten Honoring Chaco Initiative, cultural fabric of sacred Greater Chaco landscape

Dear Secretary Haaland and Director Stone-Manning:

We are grateful for your leadership and commitment around safeguarding the Greater Chaco region of northwestern New Mexico and supporting the Honoring Chaco Initiative. This sacred landscape is in great need of more comprehensive, protective, inclusive, and just land...
and resource management. We greatly appreciate the steps President Biden and the Interior Department have taken to both address existential threats to Chaco Canyon, the heart of the Greater Chaco region, and the cultural integrity of the broader landscape.

That said, we are gravely concerned that the U.S. Bureau of Land Management is currently weighing the approval of dozens of new oil and gas development proposals that collectively could lead to the drilling of more than 100 new wells, the construction of miles of new roads, and new irreparable heavy machinery disturbance across hundreds of acres of lands in the Greater Chaco region.

In the interest of meaningfully and genuinely Honoring Chaco, we urge you to:

- Direct the Bureau of Land Management to temporarily pause the approval of new oil and gas development in the Greater Chaco region.

- Direct that this pause be in place until the Honoring Chaco Initiative is complete.

There is no denying that unchecked oil and gas development has degraded and despoiled the cultural integrity of the Greater Chaco landscape. Over the last several years, a surge in development has brought horizontally drilled and fracked oil and gas wells closer and closer to Chaco Canyon. This development has increasingly encroached upon Navajo communities and irreversibly altered lands that were previously undeveloped. In many cases, this development has impacted sacred landmarks, sites, and cultural resources. This development has increased public health risks and destabilized the region’s infrastructure. Importantly, much of this development has occurred with no legitimate Tribal consultation and with complete disregard to environmental justice.

In the face of these impacts and ongoing threats, the Biden administration has endeavored to defend Greater Chaco and chart a new direction for collaborative land and resource management in the region. Under your leadership, the Interior Department has announced the “Honoring Chaco Initiative,” which encompasses two unprecedented commitments to safeguard this culturally significant landscape: a withdrawal of unleased federal minerals within 10 miles of Chaco Culture National Historical Park and a new collaborative process to address the need for landscape-level management reforms.

The latter commitment is significant. The Greater Chaco landscape extends far beyond the 10-mile buffer around Chaco Culture National Historical Park. The extent of Chacoan civilization extended across northwest New Mexico and into southwestern Colorado, southeast Utah, and northeast Arizona. Great houses, roads, and extensive artifacts attest to the cultural significance of this land, which is sacred to Indigenous communities, Tribes, and Pueblos today.

The Bureau of Land Management has recently approved over a hundred new permits for oil and gas companies to drill and develop in the Greater Chaco region, including within and near the 10-mile buffer around Chaco Culture National Historical Park. Many of these drilling
Authorizations have directly impacted lands and landmarks considered sacred or culturally significant to Navajo, Pueblo, and other Tribes in the region. Additionally, all of these drilling authorizations occurred without adequate Tribal consultation, free, prior, and informed consent, and consideration of environmental justice.

Further, the agency is currently weighing the approval of dozens of additional oil and gas development proposals. These not only threaten the cultural integrity of the Greater Chaco landscape, but threaten the integrity and legitimacy of the Honoring Chaco Initiative.

These pending proposals include, but are not limited to, the following projects under consideration by the Bureau of Land Management:

<table>
<thead>
<tr>
<th>NEPA #, DOI-BLM-NM-</th>
<th>Project Name</th>
<th>County</th>
<th>Description</th>
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<tr>
<td>F010-2022-0016-EA</td>
<td>DJR’s Nageezi Unit, E06-2308</td>
<td>San Juan</td>
<td>New oil and gas wells, new access roads</td>
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<td>F010-2022-0015-EA</td>
<td>DJR’s Lybrook, D21-2207 and E16-2207</td>
<td>Sandoval</td>
<td>New oil and gas wells, new pads, new access roads, flow lines</td>
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<td>F010-2022-0012-EA</td>
<td>Lybrook Non-unit Lease Well, I20-2207, B29-2207, A29-2207</td>
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<td>F010-2022-0004-EA</td>
<td>Nageezi Unit M25-2409, L26-2409</td>
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<td>New oil and gas wells, new pads, new access roads, new pipelines</td>
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<td>San Juan</td>
<td>New pad, new access roads, new pipelines</td>
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<td>F010-2021-0032-EA</td>
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<td>San Juan</td>
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<td>DJR Gallo Canyon Unit M26-2306</td>
<td>Sandoval</td>
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<td>DJR Nageezi Unit 601H, 602H</td>
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<td>F010-2021-0005-EA</td>
<td>DJR Operating Crow Canyon Unit I19,</td>
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<td>New wells, new pads, new access roads, new pipelines</td>
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1 More information regarding these proposals can be found on the Bureau of Land Management’s ePlanning website at [https://eplanning.blm.gov/eplanning-ui/home](https://eplanning.blm.gov/eplanning-ui/home).
In addition to these proposals, the Bureau continues to defend in court the illegal approval of hundreds of drilling permits, many of which are located within the 10-mile buffer around Chaco Culture National Historical Park. On December 16, 2021, Diné Citizens Against Ruining Our Environment, San Juan Citizens Alliance, WildEarth Guardians, and the Sierra Club filed an opening brief with the U.S. Court of Appeals for the 10th Circuit over these recent drilling permit approvals, most of which were authorized by the previous administration.²

The opening brief clearly details that these decisions are contrary to the 10th Circuit’s 2019 ruling in Diné CARE v. Bernhardt. In that case, the Court found the Bureau of Land Management had illegally failed to address the cumulative environmental impacts of drilling and hydraulic fracturing in the Greater Chaco region. In spite of these legal deficiencies, Interior continues to maintain its support for these drilling authorizations.

Given all this, we are greatly concerned that while the Honoring Chaco Initiative proceeds, the Bureau of Land Management will continue to authorize expanded oil and gas development in the Greater Chaco region. This will have the effect of limiting options for future land and resource management, putting people and communities at risk, and undermining the

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² This opening brief is available at [https://pdf.wildearthguardians.org/support_docs/20221-12-16-Greater-Chaco-Drilling-Appeal-Opening-Brief.pdf](https://pdf.wildearthguardians.org/support_docs/20221-12-16-Greater-Chaco-Drilling-Appeal-Opening-Brief.pdf).
cultural integrity of the landscape. More importantly, it will erode trust and confidence in the Biden administration’s promises to change course in Greater Chaco.

Accordingly, as the Honoring Chaco Initiative moves forward, we request the following of the Interior Department:

- An immediate pause on all new oil and gas development authorizations, including drilling permits, in the Greater Chaco region. We request this pause remain in place until the completion of the Honoring Chaco Initiative, which must include completion of ethnographic studies in the region and comprehensive updates to the Resource Management Plans for the Farmington and Rio Puerco Field Offices that align land and resource management with the Honoring Chaco Initiative. The Farmington Mancos/Gallup Resource Management Plan Amendment - Environmental Impact Statement must be abandoned so that more comprehensive land and resource management planning under the Honoring Chaco Initiative may take place.

- A commitment to review the legality of all oil and gas development authorizations within the Farmington and Rio Puerco Field Offices that have occurred since 2017. As part of this review, we demand that all illegal authorizations be withdrawn and that all yet-to-be implemented authorizations be withdrawn.

- A commitment to not extend or otherwise suspend drilling permit expiration dates.

- A commitment to not offer more oil and gas leases for sale in the Greater Chaco region and to take steps to reduce the number of existing leases by not granting or renewing any lease suspensions.

- A commitment to meaningfully consult with Tribes and Indigenous peoples with ties to Greater Chaco. In undertaking consultation, we request adherence to principles of free, prior, and informed consent.

- Expeditious completion of the mineral withdrawal for federal lands within 10 miles of Chaco Culture National Historical Park.

Again, we are grateful for your leadership and commitment around Greater Chaco. We simply ask that as the Interior Department and Bureau of Land Management follow through with the Honoring Chaco Initiative, that reasonable steps are taken to protect the landscape, communities, and the cultural integrity of the region. Please exercise forbearance and instill in us the trust and belief that the Biden administration is prepared to live up to the President’s promises.

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