



June 10, 2019

*Submitted via email to* blm\_ca\_bkfo\_oil\_gas\_update@blm.gov

Carly Summers, Project Manager  
BLM Bakersfield Field Office  
3801 Pegasus Drive  
Bakersfield, CA 93308

**Re: Bakersfield Field Office Hydraulic Fracturing Draft Supplemental Environmental Impact Statement**

Dear Ms. Summers:

Western Energy Alliance appreciates the opportunity to submit comments on the draft supplemental environmental impact statement (SEIS) analyzing the impacts of hydraulic fracturing in the Bureau of Land Management's (BLM) Bakersfield Field Office. We support the analysis in the SEIS and urge BLM to expeditiously finalize its review.

Western Energy Alliance represents over 300 companies engaged in all aspects of environmentally responsible exploration and production of oil and natural gas across the West. The Alliance represents independents, the majority of which are small businesses with an average of fourteen employees.

BLM is undertaking the current review pursuant to a settlement agreement in a case filed in the U.S. District Court for the Central District of California challenging oil and natural gas leases issued under the 2014 Bakersfield Approved Resource Management Plan Amendment (2014 ARMP). While we maintain our position that an SEIS was unnecessary to satisfy National Environmental Policy Act requirements for leasing under the 2014 ARMP, as argued in [an amicus brief](#) filed in the lawsuit, we nevertheless believe the SEIS fully complies with the terms of the settlement agreement, and encourage BLM to resume leasing for hydraulic fracturing in the planning area once a Record of Decision is issued.

The SEIS correctly concludes that the 2014 ARMP accurately estimated the environmental impacts from oil and natural gas leasing in the planning area. BLM's Reasonable Foreseeable Development scenario anticipates fewer than 40 permits per year will be issued for oil and natural gas development, with hydraulically fractured wells comprising a subset of that total.

The environmental impacts associated with that level of development are limited, and the SEIS appropriately notes that individual wells must also undergo a site-specific environmental review that incorporates "design features, Conditions of Approval (COAs), BMPs [best management practices], and stipulations." Through that process, BLM ensures the wells are in compliance with the National Environmental Policy Act, the Mineral Leasing Act, and other applicable regulations.

We appreciate that the draft SEIS incorporates the findings of a study from the Lawrence Berkeley National Laboratories (LBNL) entitled *An Independent Review of Scientific and Technical Information on Advanced Well Stimulation Technologies in California*. Some of the key takeaways BLM identified in the report were:

- There are no publicly reported instances of potable water contamination from subsurface releases in California;
- Well stimulation technologies, as currently practiced in California, do not result in a significant increase in seismic hazard; and
- Overall, in California, with today's industry practices, the direct environmental impacts of well stimulation practice appear to be relatively limited.

A [2015 EPA study](#) further concluded, based on the best available scientific evidence, that hydraulic fracturing has not led to widespread, systemic impacts on drinking water resources in the United States. That conclusion was reached after conducting the most comprehensive study of hydraulic fracturing to date, drawing from 3,700 sources of scientific information and producing 20 peer-reviewed research papers.

Both EPA's and the LBNL's well-researched and documented studies demonstrate that hydraulic fracturing has been proven, through numerous studies and ongoing implementation, to be a safe process. Therefore, the environmental impacts associated with the limited hydraulically fractured wells anticipated in the planning area were sufficiently contemplated in the 2014 ARMP, and no further review is necessary. The final SEIS should simply incorporate the management actions outlined in the 2014 ARMP and continue oil and natural gas leasing pursuant to that document.

Western Energy Alliance appreciates the opportunity to provide comments on the draft SEIS for hydraulic fracturing in the Bakersfield Field Office. Please do not hesitate to contact me with any questions.

Sincerely,



Tripp Parks  
Manager of Government Affairs