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April 13, 2012

William H. Stallings, Chief
Transportation, Energy and Agriculture Section
Antitrust Division
U.S. Dept. of Justice
450 Fifth Street NW, Ste 8000
Washington, D.C. 20530

Dear Chief Stallings,

I am writing to you regarding the anti-trust settlement in Gunnison County, Colorado in the Ragged Mountain Basin between Gunnison Energy Corporation and SG Interests.

As you know, the two companies, which were found guilty of anti-trust violations were fined only \$275,000 each. To these companies that amounts to a negligible fine when compared to their annual profit level and especially considering they're allowed to keep the leases. Further evidence of the lack of deterrence imposed by the settlement, SG Interests has been quoted as saying the company did nothing wrong and only settled for expedience and to save legal fees.

In another case, when a private citizen, Tim DeChristopher, presented bids in a Bureau of Land Management lease sale in Utah where he never intended to actually pay for the lease, he was convicted of fraud. Currently, he is serving two years in jail. Since the Supreme Court Citizens United decision stated that corporations are people, it would seem that a prison sentence would be appropriate in this incident also.

Energy development impacts communities through increased traffic and degradation of roads, human and wildlife health, air and water quality issues. I know that the fine was meant to restore the money the federal government, state of Colorado and local municipalities would've received for the lease of their public lands. However, had the bidding been completed in a non-fraudulent and competitive fashion, we might have received even more money to offset the impacts. Instead the taxpaying public received only an average of \$175 per acre with some being leased for as little as \$2 per acre.

Gunnison Energy Corporation and SG Interests have operated in the area cooperatively for years. Therefore, it would seem to be reasonable to assume that they have bid illegally in the past.

I respectfully ask that you set aside the current suit settlement and consider criminal, not civil charges. Since the leases were obtained fraudulently, I ask that you revoke the illegally obtained leases for the four parcels and investigate other lease sales involving SG Interests and Gunnison Energy, including the proposed Bureau of Land Management proposed sale currently scheduled for August 2012. SG Interests has stated they nominated 3 parcels in Gunnison County included

in this lease sale. After further investigation, you will have additional information and can formulate appropriate legal action.

Sincerely,



Marilyn Stone