

Chief Stallings,
Energy and Agriculture Section
Antitrust Division
U.S. Department of Justice
450 Fifth Street, N.W., Suite 8000
Washington, DC 20530

RE: Civil Action No. 12-CV- 00395-RPM

Dear Chief Stallings;

I was raised in the North Fork Valley in rural Colorado. I returned to the Western Slope of Colorado to do my doctoral dissertation on the social and fiscal impacts of energy development on rural local governments and communities. I stayed in this area because I am committed to the people, the economy and the landscape. It was also a good place to raise a family. Since then, I've worked for a major generation and transmission company, as well as instigated one of the West's most extensive public lands restoration projects, the Uncompahgre Restoration Project.

I'm not much of a letter writer unless our rural culture, economy and landscape are being harmed or we are being cheated. Well guess what? Both of those things are happening HERE. NOW!

Most people who reside in our area seem not to be of the "NIMBE" or "not in my back yard" persuasion. This includes me. Among other things, our citizens are people who mine things, make things and grow things. They are proud of that heritage and the skills they've acquired. But neither are most of us blind to some of the downsides of too much extraction. We have increasingly tried to do these things within reason, applying principles of fairness and good stewardship.

Currently, the BLM's willingness to sell 30,000 acres of leases in our area, when we already have a lot of mining and natural gas development, is too much. And there is slim evidence they are applying the principles of fairness and good stewardship. In fact, the evidence to the contrary. The BLM should – at a minimum – complete its Resource Management Plan. It should not rush into this much gas development and all the environmental impacts that accompany it.

Second, we have recently learned that some gas companies in our area are manipulative and sneaky. Specifically, in sworn testimony given by Tony Gale, vice president of Gunnison Energy Company y, we learned that his company and another competing company rigged a bidding process for gas leases in the Ragged Mountain Basin some 10 years ago. This was in violation of federal anti-trust laws. It is further breaking trust between our communities and these companies.

This sneaky bidding deal that I have referred to is one that others can better describe from a legal viewpoint. But because of my dissertation work on fiscal impacts, and ongoing consulting with local governments, I know some specificity the risks local governments and communities take on. It is unfathomable and unacceptable that these companies were able to use a "shift- and-shaft" strategy – increasing their profits by shifting the costs of mitigation to local governments. Obviously, they don't understand or value the concept of community stewardship. For these and other reasons I respectfully ask the Department of Justice to sit on the proposed settlement while you earnestly investigate this situation and do right by our environment, our economy, and local communities.

Very sincerely yours,



Dr. Mary Margaret Chapman
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