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Hotchkiss, CO 81419
April 20, 2012

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

Dear Mr. Stallings,

We are writing concerning the settlement in the antitrust case against Gunnison Energy Corp. (GEC) and SG Interests (SGI).

In 2004 and 2005, GEC and SGI agreed that only one of them would bid on four natural gas leases offered by the Bureau of Land Management in the area east of the Paonia Reservoir, thereby eliminating competitive bidding. When former GEC vice president Anthony Gale filed a whistleblower lawsuit, the Department of Justice entered the lawsuit on antitrust grounds and has offered a settlement under which the two firms pay fines of \$275,000 each and keep the four gas leases. Besides the wrist-slap of these fines, we have other reasons to protest this judgement:

1. The companies continue to maintain their innocence, saying that they settled only to save on legal fees. Therefore, the settlement has not served to deter further actions of this kind by them.
2. In Utah, where a man named Tim DeChristopher disrupted a BLM gas lease sale as a protest and not for monetary gain, the DOJ asked for and got a hefty fine and jail time. Mr. DeChristopher is serving two years in federal prison. The unequal application of justice by the same two federal agencies undermines respect for the law.
3. It is not fair that the two gas companies should violate the law and then get to keep the leases.
4. The two companies own many leases in the area and so far as we can tell, the DOJ has not investigated whether they obtained those other leases properly. They remain in good standing with the BLM, and may be planning to bid on upcoming lease sales.

We ask that you set aside the settlement, vigorously investigate the other BLM auctions these companies have participated in, and at a minimum revoke the four leases that the Department of Justice alleges were obtained in an illegal manner.

Sincerely,

The image shows two handwritten signatures in black ink. The signature on the left is 'Lawrence' and the signature on the right is 'Nina Parker'. Both are written in a cursive, flowing style.

Lawrence and Nina Parker