

16 April 2012

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

Re: Civil Action No. 12-cv-00395-RPM-MEH

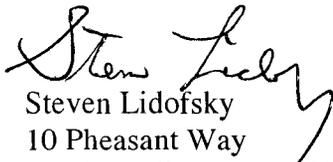
Dear Mr. Stallings:

I am writing on behalf of concerned citizens of Paonia Colorado, who have expressed dismay over the proposed sale by the Bureau of Land Management of natural gas leases east of the Paonia Reservoir. As you may be aware, there was tacit agreement in 2004 and 2005 between Gunnison Energy Corp and SG Interests to avoid competitive bidding for these leases. This came to light in an antitrust lawsuit filed by a former Gunnison Energy vice president Anthony Gale. It is my understanding that a civil settlement agreement is under consideration, which would result in modest fines but would leave the leases in the hands of the two companies involved. In my view, this is insufficient.

Each of the companies already has extensive landholdings in the region, and the settlement as proposed would remain in clear violation of antitrust laws. As former resident of the state of Colorado (and a current resident of environmentally conscious state of Vermont), I also have serious reservations about the potential environmental impact of the resultant gas drilling on the tectonic activity and health quality of the Ragged Mountain basin and its surrounding regions.

There is still an opportunity to make sure that justice is appropriately served in this case. I therefore urge you to reject the proposed settlement and instead open this investigation into potential violation of federal law by the companies involved. I hope that you will take this request seriously and that you give this case a fair review. The citizens of Colorado will thank you.

Sincerely,

  
Steven Lidofsky  
10 Pheasant Way  
South Burlington VT 05403