



NEW MEXICO ARCHEOLOGICAL COUNCIL
P.O. Box 25691, Albuquerque, NM 87125

October 21, 2010

Ms. Rebecca Hunt
Division of Minerals, N.M. State Office
Bureau of Land Management
301 Dinosaur Trail
Santa Fe, NM 87508
Rebecca_Hunt@blm.gov

Mr. Jay Spielman
Division of Minerals, N.M. State Office NM-920
Bureau of Land Management
P.O. Box 27115
Santa Fe, NM 87502-0115
Jay_Spielman@blm.gov

Dear Ms. Hunt & Mr. Spielman,

The New Mexico Archeological Council (NMAC) is writing in support of the Master Leasing Plan (MLP) nomination for the greater Chaco landscape within lands managed by the Bureau of Land Management's (BLM) Farmington Field Office submitted on October 21, 2010, by the National Trust for Historic Preservation, San Juan Citizens Alliance, and Chaco Alliance. Chaco Canyon National Historical Park (CCNHP), a World Heritage Site and listed on the National Register of Historic Places, is threatened by the potential encroachment of oil and gas development, and BLM has yet to address the direct, indirect, and cumulative impacts to CCNHP and the surrounding landscape from such development.

NMAC is a nonprofit organization whose purpose is to maintain and promote the goals of professional archaeology in the State of New Mexico. These goals include promoting awareness of New Mexico's cultural resources among public agencies, corporations, and members of the public. The majority of our membership is comprised of professional archaeologists who are permitted to conduct archaeological studies on state lands and on federal lands subject to the National Environmental Policy Act (NEPA) and the National Historic Preservation Act (NHPA). These members have extensive knowledge related to the archaeology of the greater Chaco landscape as well as expertise in agency compliance with NEPA and NHPA.

NMAC is aware that BLM is currently consulting with a number of tribes and organizations regarding the issue of oil and gas leasing around the Park, and that the consulting parties have requested that BLM place a moratorium on offering new leases within a 10-mile radius of the Park during the pendency of the consultation process. NMAC supports such a moratorium as a short-term solution to prevent new leases from being offered for sale until the impacts of oil and gas development to the Park and the greater Chaco landscape are better understood. As a long term measure, however, we believe that BLM should prepare an MLP for the greater Chaco landscape in accordance with the BLM Director's Instruction Memorandum

(IM) 2010-117, issued on May 17, 2010. This IM directs BLM to prepare an MLP for areas like the greater Chaco landscape where conflicts have arisen between oil and gas leasing and the protection of national parks. NMAC believes that BLM can use the MLP process to evaluate and revise lands open to leasing by 2003 Farmington Resource Management Plan and lease stipulations for lands within the greater Chaco landscape.

Therefore, NMAC supports the October 21, 2010, Master Leasing Plan request as a necessary step in developing and implementing a permanent plan for preserving the landscape surrounding the Park for future generations.

Sincerely,



Doug Dykeman
President Elect, New Mexico Archaeological Council
ddd Dykeman@sprynet.com
(505) 330-1825

cc:

Ti Hays, National Trust for Historic Preservation
Anson Wright, Chaco Alliance
Mike Eisenfeld, San Juan Citizens Alliance
Jan Biella, New Mexico Deputy State Historic Preservation Officer
Terry Morgart, Hopi Pueblo
Mark Mitchell, Pueblo of Tesuque
Theresa Pasqual, Acoma Pueblo
Alan Downer, Navajo Nation
Kurt Dongoske, Zuni Pueblo
C. Toya, Jemez Pueblo
Barbara West, CCNHP
Dave Evans, Manager, BLM Farmington Field Office
Signa Larralde, Sarah Schlanger, BLM State Office
Jim Copeland, BLM Farmington Field Office