



United States Department of the Interior



NATIONAL PARK SERVICE  
Zion National Park  
Springdale, Utah 84767

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JUN 06 2002

Bureau of Land Management  
Kanab, Utah 84741

IN REPLY REFER TO:

L2427 (ZION-RM&R)  
x L54

June 3, 2002

Mr. Rex Smart  
Bureau of Land Management  
Kanab Field Office  
318 North First East  
Kanab, Utah 84741

Dear Rex:

I am writing to express concern for possible impacts to Zion National Park that might result from development of several of the parcels being offered in the Notice of Competitive Oil and Gas Lease sale dated April 29, 2002. Specifically, four parcels in the Kanab Field, UT017, UT019, UT020 and UT021 include lands in the surface watershed and groundwater drainage basin that feeds the East Fork of the Virgin River upstream of Zion National Park.

Surface activities on these lands would occur directly above the Navajo Sandstone, with the potential for drilling muds or petroleum spills to have a rather direct route from the surface to the groundwater aquifer in the Navajo Sandstone. This aquifer provides almost the entire flow of the East Fork of the Virgin River as it discharges from numerous springs 6 to 15 miles west of the parcels. Unlike other aquifers in the area, the Navajo aquifer produces water of consistent high quality.

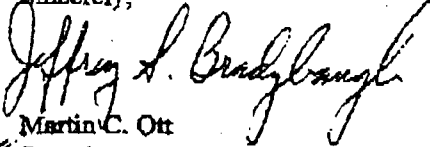
The East Fork is one of the two main rivers flowing through the park, and its entire canyon inside the park boundary has been proposed as a Research Natural Area. It also supports four species of native fish, including the Virgin Spinedace, which is being managed under a conservation agreement to avoid formal listing as a threatened species.

These same parcels were included in a coalbed methane lease notice dated March 5, 2002. At that time we expressed concern and suggested two stipulations be attached to the lease offering, (1) that drilling pits be lined or containerized, and (2) that if the production occurred from several wells in the area, a well be drilled for monitoring water levels and quality. A response letter from the BLM Utah State Office stated that these types of stipulations would be considered when an Application for Permit to Drill (APD) was received.

In this particular case, this approach can provide adequate protection for park resources. We therefore, do not object to offering any of the parcels included in the April 29, 2002 notice. We do request to be notified if an APD is received for parcels UT017, UT019, UT020 or UT021, to ensure our effective participation in the NEPA compliance for those permits.

We greatly appreciate the opportunity to review these lease offerings. If you have questions regarding these comments, please contact me or Dave Sharrow at 435-644-4318.

Sincerely,



*for* Martin C. Ott  
Superintendent

cc:

NPS Utah State Coordinator  
Park Hydrologist  
BLM State Office (R. Lopez), Salt Lake City