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Hotchkiss, CO 81419

April 18, 2012

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

Dear Mr. Stallings:

I am writing to you to express my concern about the DOJ decision in regard to the collusion between Gunnison Energy Corp. and SG Interests in the acquisition of gas drilling leases. (Civil Action No. No. 12-cv-00395-RPM-MEH)

It is intolerable that this illegal activity should be countenanced. And with the settlement agreement, that is exactly how it appears.

The companies have been allowed to keep the leases that were illegally obtained. At a minimum, these leases should be withdrawn. Allowing these companies to keep their ill-gotten gains is equivalent to allowing a thief or pirate to keep stolen goods.

The fines levied are apparently equivalent to the amount the BLM *should* have received if the bidding had not been rigged. Without a hefty *additional* fine, what incentive is there for this practice to be discontinued?

These companies got caught with their hand in the till, yet they remain in good standing with the BLM, eligible to bid on future leases. They hold numerous leases from previous auctions. The DOJ should investigate whether past leases were subject to similar illegal shenanigans.

A slap on the wrist for these companies is a slap in the face to the public that entrusts the Justice Department with an equitable application of the law.

Tim DeChristopher received a 2-year sentence and a substantial fine for his protest of BLM leasing. Is civil protest by a single individual to be punished while anti-trust crimes by powerful companies are tolerated?

I am asking you to set aside the settlement and seek a ruling commensurate with the caliber of the crime.

Sincerely,



Gordon A. MacAlpine