

Robyn C. Morrison

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April 16, 2012

William H. Stallings
Chief, Transportation, Energy and Agriculture Section, Antitrust Division
US Department of Justice
450 Fifth Street, NW Suite 8000
Washington DC 20503

RE: Civil Action No. 12-cv-00395-RPM Gunnison Energy and SG Interests Antitrust
Proposed Settlement.

First and foremost, I want to thank the Justice Department for pursuing this anti-trust violation. As a taxpayer and user of public lands that are also leased for oil and gas drilling, I appreciate that this is the first I would like to encourage the Justice Department to set aside the settlement for now and properly investigate the activities of Gunnison Energy (GEC) and SG Interests with regards to collusion and activities that violate the Sherman anti-trust law. It has been common knowledge for a number of years throughout the North Fork Valley community, a small, rural community located near the parcels and near other GEC leasing and drilling operations, that GEC and SG Interests had a 'gentleman's agreement' to not bid against each other at Bureau of Land Management oil and gas lease auctions.

Clearly, the investigation that has been undertaken so far uncovered the basis for this information circulating throughout the community. I encourage the Justice Department to do a more active and thorough investigation of other leases purchased by these two companies, as well as the activities of the Bureau of Land Management's Uncompahgre Field Office in Montrose, Colorado, associated with these leases. As you know, this BLM field office is directly responsible for processing leases nominated by these two companies, and would likely have know about the 'gentleman's agreement'.

With regards to the proposed settlement, I believe it is insufficient. Both SG Interest and GEC show no contrition with regards to their activities and the reason for the proposed settlement. As reported in the Delta County Independent, (<http://www.deltacountyindependent.com/news/delta-area/25891-federal-antitrust-lawsuit-settled.htm>) GEC and SG Interests chalk up the settlement as a means to avoid legal costs associated with the investigation. In other words, neither company is indicating that they understand the law has been broken and that those laws will be followed in the future. This suggests that the laws that guide bidding on mineral leases will continue to be flaunted by the company and taxpayers will continue to bear the brunt of this arrogance when competitive bidding for oil and gas leases is thwarted by industry.

These leases are in an area that had proven reserves of gas and ownership should be revoked so that the competitive bidding process can be honored at a future date and the Federal Government receive the proceeds from competitive pricing.

In addition, the fairness of the proposed consequences for GEC and SG Interests collusion on bidding is questionable. As you are aware, in December 2008, Tim DeChristopher bid on leases in Utah as an act of civil disobedience to protest leasing of areas he believed worthy of protection and to draw attention to the connection between fossil fuels and global climate change. Across the region, editorials in newspapers and the lauded the two-year federal prison sentence as appropriate and necessary to uphold the rule of law and to maintain the integrity of the federal lease auction, which, according to the Desert News “cannot be made into a farce without consequences.” (<http://www.deseretnews.com/article/700166707/Tough-consequences.html>).

I urge the Justice Department to consider the consequences of DeChristopher’s actions and the actions of those leading GEC and SG Interests operations. A comparison will clearly show that the actions GEC and SG Interests and those involved deserve similar punishment for their actions that ultimately disrupted competitive bidding at BLM mineral lease auctions.

Thank you for your consideration,

A handwritten signature in black ink that reads "Robyn Morrison". The signature is written in a cursive, flowing style with a long, sweeping tail on the "n" of Morrison.

Robyn Morrison