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21 April, 2012

William H. Stallings
Chief, Transportation, Energy & Agriculture Section
Antitrust Division
U.S. Department of Justice
450 Fifth Street NW Ste 8000
Washington, DC 20530

Dear Bill,

A friend alerted to the end of comment period April 23rd in the US vs SGI, et al. I called Friday, too late to learn if comments can be emailed. It was friendly sounding on your outgoing message and refreshing to hear.

Included in this letter are specific reasons why I am requesting that the settlement be set aside and harsher penalties assessed.

First I acknowledge that you are charged with detailed guidelines in finding your determination. However in reading the Federal Register Notice ethical questions arise outside the confines of legalism. Just because a settlement is arrived at legally doesn't mean it is right.

Reading Through The Notice it is clear that there indeed was a MOU between the two companies. Representatives claim they settled to save the expense of defense and denied any guilt saying their actions are common practice in the industry. Just because practices are common doesn't mean they are either legal or if legal that they are ethical.

From the perspective of one among many who face potentially devastating impacts from the actions of not only these two companies but also many more the public interest would be much better served in this specific instance and in the future by more severe penalties and/or further investigations into common practices which may well be found to be illegal in addition to being unethical.

We live in a time when concentrations of wealth and accompanying political influence threaten quality of life for ordinary citizens in too many ways to mention here. My interest in this case is linked to the potential threats to water resources and quality of life in the areas where these violations took place.

The checks and balances built into our Federal Government have almost completely disappeared. As a person in a very important position you can make a huge difference. I am not a lawyer. I look to you to watch out for the future because of the special role you play.

If this settlement is set aside and the matter looked at in more detail it will be a worthwhile investment to protect the public interest now and for future generations. A thorough investigation might or might not find them innocent. In any event it would raise many points which ought to be explored publicly about common practices and the common good.

Brad Robinson, president of GEC, said to a local newspaper reporter that the settlement will enable the company to avoid even more expense defending itself. If they hadn't engaged in questionable practices they wouldn't have those expenses. The expenses are usually reduced to monetary expenses but the oil and gas industry has the ability to cost society as a whole immeasurable and sadly, in some

instances irreparable damage. The time for ignoring the real total cost of our actions is past.

It is ironic that a young protestor in Utah named Tim DeChristopher acting without forethought faces prison time for disrupting one lease sale while corporations with forethought act in an unethical manner, pay with relatively much smaller consequences and go on to conduct business as usual.

So, I call on you in the D.O.J. to set aside this Proposed Final Settlement and 1) determine whether SGI & GEC obtained other leases improperly; 2) require them to give up the leases so obtained; and 3) enter into a thorough, public investigation of industry practices via this case. These actions will lead to a sorely needed discourse on proper regulation of the oil and gas industry for the public good.

Sincerely,



- ② County Rd
- ⑬ State Hwy
- Bear Ranch
- ▨ Other Private
- BLM
- ▨ USFS
- State Rec Area
- - - Subdivision
- ▬ Public Access Roads
- ▬ Private or Disputed Roads
- ▬ State Highway
- ▬ County Roads
- Trail Head

Tomahawk Res

Williams Lake

RAGGED'S WILDERNESS

Zanin

Upper Bear Ranch

Deep Cr Trail Head

Raggeds Trailhead

Land To Be Lost

TO BILL KOCH

1

Deep Creek

Lower Bear Ranch

Erickson Springs Campground

27

Anthracite Creek

12

Map for illustration only

Know Your Place Maps
geekfitter@gmail.com



Distance in Miles

To Crested Butte

To McClure Pass

5

1

2

133

4

6

3

PACONIA