

Justin S. Greene
Commissioner, District 1

Lisa Cacari Stone
Commissioner, District 2

Camilla Bustamante
Commissioner, District 3



Adam Fulton Johnson
Commissioner, District 4

Hank Hughes
Commissioner, District 5

Gregory S. Shaffer
County Manager

July 20, 2026

The Honorable Doug Burgum
Secretary of the Interior
U.S. Department of the Interior
1849 C Street NW
Washington, DC 20240
Electronically submitted via BLM ePlanning
NEPA Project No. DOI-BLM-NM-F010-2026-0002-EA

**Re: Strong Opposition to Revocation or Reduction of the Public Land Order No. 7923
Withdrawal (10-Mile Buffer) Protecting Chaco Culture National Historical Park**

Dear Secretary Burgum:

On behalf of the Santa Fe County Board of County Commissioners (Board) and the residents of Santa Fe County, we write to express our strong and unequivocal opposition to the Bureau of Land Management's proposal to revoke, in whole or in part, Public Land Order No. 7923 – the order that established a 20-year, approximately 336,400-acre mineral withdrawal creating a protective buffer of roughly 10 miles around Chaco Culture National Historical Park.

We urge the Department to select the No Action Alternative and to retain the full withdrawal exactly as it stands.

Chaco Canyon is not a relic to be managed alongside routine multiple-use decisions. It is the ceremonial and cultural heart of a living landscape that has anchored the Pueblo, Diné (Navajo), and other Indigenous peoples of this region for over a thousand years, and it remains sacred and central to their traditions and identity today. The Greater Chaco landscape is recognized as a UNESCO World Heritage Site precisely because of its irreplaceable significance to human history. Archaeologists estimate that as many as 12,000 cultural and archaeological sites lie within the 5-to-10-mile zone alone, and only an estimated 15 to 20 percent of that land has ever been surveyed. Opening this largely undocumented landscape to new oil, gas, and mineral leasing risks the permanent, unrecoverable loss of sites we have not yet even had the chance to identify and protect.

The communities of the Greater Chaco region have already borne a disproportionate share of the impacts of energy development, with more than 37,000 oil and gas wells drilled on the surrounding lands and well-documented harm to air quality, water resources, and public health. The 2023 withdrawal preserved some of the last undeveloped public land in that heavily

industrialized landscape. It did so without disturbing valid existing rights, without affecting private, Tribal, or allottee lands, and without touching the more than 90 percent of surrounding federal minerals that remain open to leasing. **The BLM's own analysis has acknowledged that this withdrawal area is not a favorable target for future development, which makes the case for reversing it even harder to justify against the certain and irreversible cultural harm that new leasing would cause.**

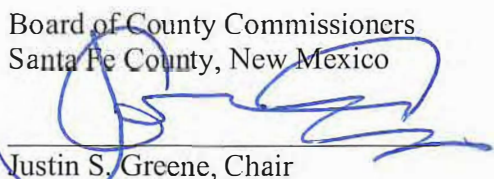
We are equally troubled by the process the Department has chosen for reconsidering this protection. The 2023 withdrawal was the product of an extensive, multi-year public process – 150 days of public comment, seven public meetings, and sustained government-to-government Tribal consultation that generated more than 160,000 supporting comments. **The current 14-day, digital-only comment period, following an April 2026 scoping period in which more than 100,000 members of the public already registered their opposition, does not come close to affording the meaningful participation this decision demands.** It is particularly inadequate for the Tribal communities whose ancestral heritage is most directly at stake and who deserve, at minimum, the same depth of consultation that produced the original withdrawal.

The public has already spoken clearly and in overwhelming numbers. **Santa Fe County joins that public in urging the Department of the Interior to reject both alternatives under consideration – full revocation of the withdrawal and reduction of the buffer to 5 miles – and to instead maintain Public Land Order No. 7923 in its entirety.** Greater Chaco deserves permanent, durable protection, not repeated threats of rollback that force Tribal Nations and the public to keep refighting a battle that was already won through years of good-faith process. We respectfully request written confirmation that this letter has been entered into the administrative record for NEPA Project No. DOI-BLM-NM-F010-2026-0002-EA, and we ask to be kept informed of further developments in this process.

Thank you for your consideration of Santa Fe County's position on this matter of profound and lasting importance.

Respectfully submitted,

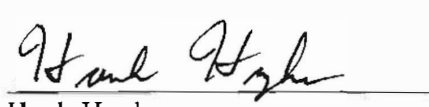
Board of County Commissioners
Santa Fe County, New Mexico



Justin S. Greene, Chair
Commissioner, District 1



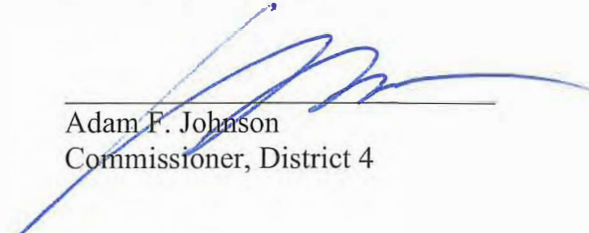
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Hank Hughes
Commissioner, District 5



Lisa Cacari Stone
Commissioner, District 2



Adam F. Johnson
Commissioner, District 4

cc:

Stevan Pearcc, Director, Bureau of Land Management

The President, The White House

The Honorable Ben Ray Luján, United States Senate

The Honorable Martin Heinrich, United States Senate

The Honorable Teresa Leger Fernández, United States House of Representatives

