

PUBLIC AND AGENCY COMMENTS
Supplement To The
FINAL ENVIRONMENTAL IMPACT STATEMENT

Shell Western E&P Inc., Miccosukee 3-1 Exploratory Well
Miccosukee Indian Reservation, Broward County, Florida

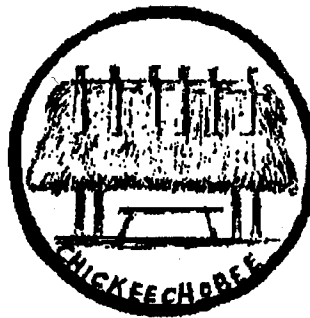
July 29, 1994



Bureau of Land Management
Eastern States
Jackson District
Jackson, Mississippi



Bureau of Indian Affairs
Eastern Area Office
Arlington, Virginia



Miccosukee Tribe of Indians of Florida
Miami, Florida

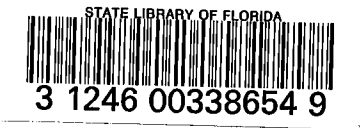


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SECTION 1

INTRODUCTION

PUBLIC AND AGENCY COMMENTS DOCUMENT

INTRODUCTION

This supplemental document to the Shell Western E & P Inc., Miccosukee 3-1 Exploratory Well, Final Environmental Impact Statement (FEIS) presents comments from the public, private businesses, and government agencies that are related to the Draft Environmental Impact Statement (DEIS).

The DEIS was filed with the Environmental Protection Agency during the week of March 8, 1993. A "Notice of Availability" was published in the Federal Register on March 17, 1993. Based on this notice, the public was invited to comment on the DEIS until May 18, 1993. Subsequently, the public comment period was extended to August 18, 1993. Notice of the extension to the comment period was published in the Federal Register on June 17, 1993.

In addition to the Notice of Availability, a variety of methods were used to inform interested parties of the DEIS. These methods included: press releases and newspaper legal notices; a mailed notice to those on the interested parties list which was compiled during the DEIS scoping process; a BLM/BIA press meeting held in Fort Lauderdale, Florida, on April 13, 1993; an open house and public hearing held in Fort Lauderdale, Florida, on April 14, 1993; distribution of the DEIS to federal agencies and the State of Florida Clearinghouse administered by the Governor's Office; distribution of reading copies of the DEIS to the Broward County, Leon County and Palm Beach County public libraries, and the State Library in Tallahassee, Florida; and distribution of reading copies to the BLM Office of Public Affairs, Washington, D.C., BLM, Jackson District office and BIA, Arlington, Virginia office. Approximately 275 copies of the DEIS and 450 copies of a DEIS Summary Document were distributed to organizations, government agencies and individuals.

On April 14, 1993, a public hearing was held at the Greater Fort Lauderdale - Broward County Convention Center, 1950 Eisenhower Boulevard, Fort Lauderdale, Florida. The hearing was attended by approximately 350 people. Oral comments were presented by 51 people and recorded by a transcript service.

By August 18, 1993, 425 comment letters were received by the Bureau of Land Management. The hearing transcripts and letters were reviewed, analyzed and considered in preparing the FEIS. All letters of comment to the DEIS and a complete transcript of the April 14, 1993 public hearing are contained in this document.

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DOCUMENT ORGANIZATION

Pages PH-1 through PH-39 contain the transcripts of the public hearing that was held on April 14, 1993.

An index of letters with assigned identification numbers precedes the public and agency letters. The comment letters are coded: I - individual; B - business; O - organization; LG - local government; SG - state government; FG - federal government; P - petition. The numbers are repeated at the top of each letter page and petition page.

On the hearing transcript pages, substantive comments are highlighted. On the letter pages, substantive comments are identified by a bar in the margin. Comment numbers ranging from 1 to 95 have been placed beside each comment.

The letter, petition or hearing page number, followed by the comment number is a code used to identify the source and issue. The codes appear in the response to comments. The response to comments is not presented in this document. The response to comments can be found in Section 5.1.4 of the FEIS. A summary of comments and a listing of commenters precedes the hearing transcript and comment letters in this supplemental document.

SECTION 2

SUMMARY OF COMMENTS

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SUMMARY OF COMMENTS

The substantive comments can be categorized as: 1) inaccuracies and discrepancies; 2) adequacy of the analysis; 3) identification of new impacts, alternatives, or mitigation measures; or 4) disagreements with significance determinations.

Analysis of the substantive comments indicated that similar comments could be grouped and assigned an issue number. Ninety-five issues were identified. These issues pertain to one of 21 major topics. The 21 major topics are presented in alphabetical order. Each issue under each major topic is identified by issue number and a brief statement of the nature of the comment(s), followed by the comment identification code(s). The actual text of the comment is provided. For those cases where more than one comment was made on the same issue, one comment is quoted that was determined to best represent the issue. The agency response to each issue is in Section 5.1.4. of the FEIS.

A summary of the major topics (listed alphabetically in bold print), corresponding issue(s) and comment(s) follows:

Access

- Issue 1 DEIS does not contain details concerning road construction on berm.
- Issue 2 Disagree with acreage of road turnouts.
- Issue 3 Recommends more details of Alternative B access road, impact to wetlands.
- Issue 4 Highway Department agrees with access from I-75 via Snake Road Interchange.
- Issue 5 Questions reasons for FHWA opposition to Alternative C.

Affected Environment

- Issue 6 DEIS needs to be expanded to include historical Everglades.

Air Quality

- Issue 7 DEIS fails to properly evaluate gas flaring procedures, other contaminants and air pollution monitoring.

Alternatives

- Issue 8 Improper restriction of No Action Alternative.
- Issue 9 DEIS fails to adequately consider alternatives.

Archaeological Resources

- Issue 10 Concerns the cultural resource potential of the tree islands.
- Issue 11 DEIS adequately addresses state's concerns for archaeological preservation.
- Issue 12 Nearby archaeological site should be avoided.

Cumulative Impacts

- Issue 13 DEIS fails to evaluate cumulative impacts upon the Everglade ecosystem.
- Issue 14 Concerns cumulative impacts, impacts on state land use programs and Everglades restoration plans.

Full Field Development

- Issue 15 DEIS fails to consider effects of oil development in area. Contrary to Conner v. Burford.
- Issue 16 DEIS does not analyze worst case oil spill.
- Issue 17 Requests that agency retain authority to restrict further development based on Sierra Club v. Peterson.
- Issue 18 Concerns further drilling and production in Water Conservation Area.
- Issue 19 Questions what basis production and field development are not reasonably foreseeable.
- Issue 20 DEIS should specify level of analysis for production and/or field development.
- Issue 21 DEIS fails to include analysis of oil transport.
- Issue 22 DEIS does not consider gain against risk of oil and gas development.
- Issue 23 Concerns that drilling would set a legal precedent.

Hurricane Contingency Plan

- Issue 24 Questions adequacy of hurricane contingency plan.

Hydrology

- Issue 25 DEIS fail to include analysis of Everglades Restoration Plan.
- Issue 26 Data concerning location of Biscayne aquifer is not accurate.
- Issue 27 Requests "Sole Source Review".
- Issue 28 DEIS does not adequately address wetlands and floodplains under Executive Orders 11990 and 11988.
- Issue 29 Concern that the gray limestone aquifer is hydraulically connected to the Biscayne aquifer.
- Issue 30 Concerns pertaining to direction of drainage from proposed well site.
- Issue 31 Concerns relative to proximity and effects on Biscayne aquifer and Water Conservation Area. DEIS is not based on scientific field studies.

- Issue 32 DEIS fails to consider applicability of UIC rules to disposal of drilling fluids.
- Issue 33 DEIS does not analyze long term migration of contaminants or monitoring of potential contaminants.
- Issue 34 Inadequate evaluation of effects on Floridan and gray limestone aquifer.
- Issue 35 Questions adequacy of 4-foot high containment berm.
- Issue 36 DEIS fails to analyze spills into canals.
- Issue 37 Concerns the lateral migration of contaminated groundwater.
- Issue 38 DEIS fails to consider contamination of groundwater due to drilling pressure.
- Issue 39 Questions how injected produced water would be prevented from spreading in substrates.
- Issue 40 Questions how public would be provided fresh water in case of disaster.
- Issue 41 Questions whether Appendix A-6 was included as scientific support for the BLM position.
- Issue 42 Concerns that short term use could threaten the Biscayne aquifer.

Jurisdiction

- Issue 43 Concerns about the public interest in the proposal.
- Issue 44 DEIS does not contain a Coastal Zone Management Act consistency determination.
- Issue 45 Claims that the DEIS conflicts with state plans. DEIS should address impact to drinking water and social and economic impacts.
- Issue 46 States that the South Florida Water Management District Governing Board passed resolution opposing proposal.
- Issue 47 Claims that the state has civil regulatory jurisdiction over the on-reservation drilling activity.
- Issue 48 Concern about right-of-way on levee, berms and canal.
- Issue 49 Proposal has no significant impact on state transportation system and partially satisfies Coastal Zone Management consistency requirements.
- Issue 50 Proposal generally agrees with state's oil and gas development regulations.
- Issue 51 Claims that the water conservation area is state land and not Miccosukee's.

Land Use

- Issue 52 DEIS fails to include discussion of the Florida Executive Order banning development in Water Conservation Areas.

Monitoring and Enforcement

- Issue 53 Recommends adding laboratory analysis of petroleum hydrocarbon to monitoring wells.
- Issue 54 Requests that EPA review plans and monitor disposal of waste by injection.
- Issue 55 Questions adequacy of SPCC plan.
- Issue 56 DEIS does not evaluate financial commitments in case of spill.

- Issue 57 Suggests resistivity and porosity logs be run on open hole conditions before setting casing.
 Issue 58 Questions monitoring of truck speeds, emissions and noise.

NEPA Process

- Issue 59 Requests that decision on proposal be made by the Secretary of the Interior.
 Issue 60 Questions if DEIS provides Federal accountability.
 Issue 61 Questions why EPA was not a Cooperating Agency.
 Issue 62 DEIS does not include a disclosure statement.
 Issue 63 DEIS does not meet NEPA goals of enhancing "quality of the human environment."

Noise

- Issue 64 DEIS does not adequately analyze effect of noise on wildlife.
 Issue 65 DEIS fails to address effect of noise during wading bird breeding periods.

Socioeconomics

- Issue 66 DEIS fails to address impacts to tourism.
 Issue 67 DEIS fails to address impacts to communities.
 Issue 68 Project is consistent with Department policies to promote economic development in economically distressed areas.

Spills

- Issue 69 Concerns relative to on-site impacts due to leaks before and after exploratory well abandonment.
 Issue 70 Concern that groundwater would be contaminated from previous diesel fuel spill and that water wells would pull fuel into exploratory well.
 Issue 71 Recommends expansion of lined area.
 Issue 72 DEIS fails to show probability of spills and spill record.

Vegetation

- Issue 73 Vegetation report not accurate of true character of area.
 Issue 74 DEIS does not consider vegetation adjacent to Snake Road.

Visual Resources

- Issue 75 DEIS fails to recognize impacts on visual quality and effects on people and wildlife.

Waste Management

- Issue 76 DEIS does not adequately analyze containment, testing, and disposal of wastes.
 Issue 77 Concerns radioactive levels in water and effects on humans and wildlife.
 Issue 78 Questions applicability of offshore surface water discharge standards
 Issue 79 Inconsistent specifications for plastic liner.
 Issue 80 Concerns movement of drill cuttings.
 Issue 81 Insufficient discussion of composition, transport, and storage of drilling fluid components.

Well Abandonment

- Issue 82 Abandonment of water wells.
 Issue 83 Impacts of well and haul road abandonment.
 Issue 84 Time limit on exploratory well abandonment.

Wildlife Resources

- Issue 85 Inadequate data on Florida panther telemetry.
 Issue 86 DEIS does not evaluate effects of spills on wildlife and habitat.
 Issue 87 Inadequate analysis of effects on Florida panther.
 Issue 88 Recommends formal Section 7 Consultation and range of Florida panther.
 Issue 89 Recommends non-consumptive land use on Reservation because of panther range.
 Issue 90 DEIS fails to consider ecological significance of ecotone.
 Issue 91 Appendix A-9 fails to address adverse effects on wildlife.
 Issue 92 DEIS fails to address impacts of man-made or natural catastrophes on wildlife.
 Issue 93 Concerns critical habitat designation for Florida panther. DEIS fails to consider cumulative impacts on panther.
 Issue 94 DEIS fails to disclose actual panther activity.
 Issue 95 DEIS fails to show importance of area for dispersal of sub-adult panthers.

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SECTION 3

NAMES OF COMMENTERS

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NAMES OF COMMENTERS

An alphanumeric code was developed to identify the individuals and organizations who submitted written comments or provided oral comments at the public hearing. The assigned code identifies the page of the Public and Agency Document where each substantive comment can be found. This code further identifies the individual(s) or organization(s) offering the specific comments on the issues covered in Section 5.1.4 of the FEIS. A listing of the alphanumeric code and corresponding individual(s), businesses, organization(s), and agencies that provided comments are provided below:

INDIVIDUAL

Individual alphanumeric codes are listed in alphabetical sequence, ordered by surname. In the case of double last names, the alphanumeric codes are listed in sequence by the second surname. Individual surnames which include a prefix are listed at the beginning of each alphabetic category. McCluskey, for example, would precede all surnames which do not include a prefix. The listing of alphanumeric codes for individuals is as follows:

I-1	Ms. Rose Adams	I-24	Mr. Brett D. Boulmay
I-2	Ms. Maisy Alpert	I-25	Ms. Jocelyn Boyce
I-3 to I-4	Ms. Wendy M. Altman	I-26	Mr. Paul Brandofino
I-5 to I-6	Mr. George Amreihn	I-27	Ms. Myra C. Becher
I-7	Mr. Mauro Aronovski	I-28	Ms. Joy Bright
I-8	Ms. Stella Ashen	I-29 to I-30	Mr. Chad Brocato
I-9	Mr. Mark Asmus	I-31	Ms. Kathleen T. Brock
I-10	Ms. Miriam Assef	I-32	Mr. Thomas J. Brosnan
I-11	Ms. Jessica Azola	I-33	Mr. & Mrs. Edgar H. Brown
I-12	Mr. Karl A. Baden	I-34	Ms. Elaine Brown
I-13	Mr. Sheezan Bakali	I-35 to I-36	Ms. Marian D. Browne
I-14	Mr. Louis B. Banasky	I-37	Ms. Barbara J. Brush
I-15	Mr. F. C. Barhoover	I-38	Mr. Douglas Burleson
I-16	Ms. Florence R. Beardsley	I-39	Mr. Christopher Burroughs
I-17	Mr. Chris Beck	I-40	Ms. Rachel Bussel
I-18	Ms. Gertrude M. Bishop	I-41	The Cannon Family
I-19	Ms. Judy Bissell	I-42	Ms. Bernice C. Carlson
I-20	Mr. Darrell L. Black	I-43	Ms. Tracey Carlson
I-21	Ms. Mary D. Blackman	I-44	Ms. D. H. Carmody
I-22	Ms. Esther E. Blanton	I-45	Ms. Martha E. Carnes
I-23	Mrs. A. Bonk	I-46 to I-47	Ms. Joan W. Carroll

NAMES OF COMMENTERS

I-48	Mr. L. B. Case, Jr.	I-85	Mrs. Emily N. Dipple
I-49	S. Chisen	I-86	Dr. Guy A. Distasio
I-50	Ms. Julia Chretien	I-87	Ms. Suzanne Donovan
I-51	Mr. Richard Chung	I-88	Charles & Gloria Dunsford
I-52	Ms. Ruth H. Clark	I-89	Ms. Ellie Durr
I-53	Mr. N. Montgomery Clarke	I-90	Ms. Teresa A. Dwyer
I-54	Mr. Santo J. Coco	I-91	Armand & Martha Dynner
I-55	Mr. Randolph L. Compton	I-92	Mr. Arthur Eichner
I-56	Ms. Suzanne Conner	I-93	Mr. Manuel Elaraj
I-57	Mr. Dennis Connolly	I-94	Mr. Don R. Elderkin
I-58	Ms. Jane Copenhaver	I-95	Ms. Barbara J. Elliott
I-59	Mr. Boies Coppinger	I-96	Mr. Wayne Engroff
I-60	Mr. Donald L. Cosby	I-97	Mr. Lennard C. Ericsson
I-61	Ms. Jan Cosby	I-98	Ms. Marlene Escoto
I-62	Richard & Muriel Covington	I-99	Ms. Ethel E. Fallon
I-63	Ms. Dorothy A. Cowdrey	I-100	M. & J. Fasano
I-64	Mr. Timothy A. Crain	I-101	Mr. Greg Fernandez
I-65	Mr. John G. Croes	I-102	Mrs. Ann Feters
I-66	Mr. Paul W. Croy	I-103	Mr. Allen Filekoff
I-67	The Cullis Family	I-104	Charles & Lillian Finger
I-68 to I-69	Mr. Angelo V. D'Alessandro	I-105	Ms. V. Virg Foland
I-70	Mr. & Mrs. Scott Dash	I-106	Ms. Winnie Foster
I-71	Mr. Fred J. Davies	I-107	Ms. Linda M. Francis
I-72	Ms. Kelley Ann Davis/ Mr. Don R. Elderkin	I-108	Mr. Clarence Freeman
I-73 to I-74	Mr. Timothy Day	I-109	Mr. Arthur M. Friedrichs
I-75	Mr. Wesley H. Day	I-110	Mrs. Adele V. Frisch
I-76	Mrs. Nada DeGaetano	I-111	Mr. Gerald Fritz
I-77	Ms. Sherie DeGroff	I-112	Mr. Kenneth L. Frost
I-78	Ms. Susan Deifallah	I-113	Mr. Robert Gallagher
I-79	Mr. Jeff Delgado	I-114	Mr. John Gallo
I-80	Mr. Luiz A DePaula Santos	I-115	Mr. & Mrs. Robert J. Gardner
I-81	Ms. Audrey E. De Rosa	I-116 to I-117	Mr. A. P. Garner
I-82	Mr. Fred A. Dickmeyer	I-118	Mr. James L. Garrett
I-83	Mr. A. L. Diehl	I-119	R. Gehlert & Family
I-84	Mr. J. P. Dinkel	I-120	Sister Teresa Gerlits
		I-121	Mr. Theodore H. Gilbert

NAMES OF COMMENTERS

I-122	Mr. Darren Giuffre	I-163	Mr. John J. Hopkins
I-123	Mr. Gary Gold	I-164	Mr. Scott Horowitz
I-124	Ms. Helen L. Goldin	I-165	Mr. W. W. Horstman
I-125	Mr. Sidney Goldin	I-166	Ms. Lguana Howard
I-126	Mr. C. B. Goodman	I-167	Mrs. J. A. Hugh
I-127	Mr. P. Graef	I-168	Mr. George G. Hughes
I-128 to I-129	Ms. Heather Grand	I-169	Mr. Leonardo Iannone
I-130	Mr. David Green	I-170	Mr. Carlton Inman
I-131	Mr. Edward B. Green	I-171	Ms. Rae Irland
I-132	Mr. Thomas Gunderman	I-172	Mr. Bill Irwin
I-133	Mr. J. J. Guyett	I-173	Violet & Leo Isacson
I-134	Ms. Eleanor Haarmeyer	I-174	Mr. M. Carpenter-Jaquinta
I-135	Ms. Shari L. Haas	I-175 to I-176	Mr. Paul G. Jameson
I-136	Mr. Albert Haerberle	I-177	Ms. Joan W. Jenrich
I-137 to I-138	Mr. Gordon W. Hagey	I-178	Ms. Lauren A. Jewell
I-139	Peggy & Robert James Hall	I-179	Mr. W. H. Jobe
I-140	Mr. John E. Harman	I-180	Mr. Bevin John
I-141	Ms. Denise Harris	I-181 to I-182	Ms. Dorothy Johnson
I-142	Mr. H. L. Hassell	I-183	Mr. Perry W. Johnson
I-143	Ms. Janet Hassoun	I-184	Ms. Joan Johnston
I-144	Mr. William Heim	I-185	Mr. G. Jones
I-145	Ms. Joan Heiman	I-186	Mr. Frank H. Jones, Jr.
I-146	Mr. J. Heisner	I-187	Ms. Jan Jones
I-147	Ms. Dorothy M. Henfield	I-188	Ms. Peggy M. Juntilla
I-148	Mr. Andrew G. Henning	I-189 to I-190	Richard & Edith Kappler
I-149	Ms. Monique Henry	I-191	Milton & Bonnie Katz
I-150 to I-151	Ms. Sheri Hensley	I-192	Mr. Howard Katzman
I-152	Morton & Rita Hepner	I-193 to I-194	Ms. Sherra Keeley and Mom
I-153	Mr. M. M. Hess	I-195	Mr. Edward Kempa
I-154	Mr. Richard J. Hess	I-196	Mr. Samuel Kendall
I-155	Mr. Daniel Higgins	I-197	Mr. William F. Kenney
I-156 to I-157	Ms. Linda A. Hill	I-198	Mr. Steven P. Kent
I-158	Ms. Edith Hilton	I-199	Ms. Rose Kenach
I-159	Ms. Helen Hirschfeld	I-200	Ms. Dawn A. Keon
I-160	William & Mary Holsworth	I-201	Ms. Hope C. Kimbrell
I-161 to I-162	William & Jeanne Homer	I-202	Mr. Donald H. King

NAMES OF COMMENTERS

I-203	Mr. Brian F. Kingston	I-241	Mr. Aston Mattis
I-204	Mr. George A. Kitchen	I-242	Ms. Anne Maurer
I-205	Ms. Karen Klein	I-243	Ms. Cherie K. Mazzenga
I-206	Mr. Michael Klein	I-244 to I-246	Ms. Lynn A. Meder
I-207	Mr. Florence R. Knice	I-247	Ms. Velda M. Meloy
I-208	Mr. & Mrs. Milton Knopoff	I-248 to I-250	Ms. Cathy Menendez
I-209	Ms. Heidi Knost	I-251	Jules V. & Barbara L. Meyers
I-210	Ms. Elizabeth A. Knowles	I-252	Charles & Nancy Miller
I-211	Mr. Ray A. Kralis	I-253	Ms. Margie Miller
I-212	Mr. Richard F. Kulow	I-254	The Mills Family
I-213	Mrs. Lois M. Lacoste	I-255	Mrs. Esther B. Mintz
I-214	Ms. Melissa A. Lakey	I-256 to I-257	Ms. Jacqueline Monckton
I-215	Ms. Nancy Lanzi	I-258	Ms. Allen Morgan
I-216	Ms. Gail Larkin	I-259	Ms. Dana Morgan
I-217	Ms. Iris Larson	I-260	Ms. Pam Morgan
I-218	Ms. Maggie Lee	I-261	Ms. Martha Munzee
I-219	Ms. Michele LeFeore	I-262	Ms. Margaret Murphy
I-220	Mr. Howard E. Lemaster	I-263	Mr. Fred Myers
I-221	Ms. Geri Levites	I-264	Mr. Cary Nagy
I-222	Ms. Susan R. Libera	I-265	Mr. Paul Nanes
I-223	Ms. Elsa Lindenfeld	I-266	Ms. Linda Neale
I-224	Mr. George H. Link	I-267	Mr. Steve Nelson
I-225	Ms. Debbie Lord	I-268	Keith & Elizabeth Newman
I-226	Mr. Rick Loss	I-269 to I-270	Ms. Kathleen M. Nicula
I-227	Mr. Ronald N. Lyall	I-271	Mrs. Helen K. Nielsen
I-228	Dottie Lyons	I-272	Mr. Matthew Noonan
I-229	Ms. Josephine McArthur	I-273 to I-274	Ms. Susan Noonan
I-230	Mrs. Gloria R. McCluskey	I-275	Mr. Richard Obregon
I-231	Ms. Joann McDaniel	I-276	Ms. Patricia O'Connor
I-232	Mr. Robert E. McDonnell	I-277	Ms. Jan Craig-Olinger
I-233 to I-235	Mr. Stephen G. McKenzie	I-278	Mr. James R. O'Neal
I-236	Ms. Gloria Mack	I-279	Mrs. Rosemarie O'Neidas
I-237	Mr. John Malloy	I-280	Mr. James Ongley
I-238	Chet & Marilyn Markot	I-281	Mr. Tom Paddock
I-239	Ms. Mary Ann Massey	I-282	Ms. Kathy Pawlak
I-240	Mr. Jack Mathews	I-283	Ms. Browne Pearson

NAMES OF COMMENTERS

I-284	Ms. Natisha L. Peavy	I-333	Mr. Stephen G. Schorr
I-285	Ms. Burnette Pope	I-334	Mrs. R. L. Schreiber
I-286	Israel & Edith Port	I-335	Herbert & Ruth F. Schwartz
I-287 to I-288	Ms. Louise C. Porter	I-336	Gerard & Joanne Shrewsbury
I-289	Mr. & Mrs. John Prenovitz	I-337	Mrs. Gladys Schroeder
I-290 to I-291	Ms. Sharon A. Proue	I-338	Captain Jennifer Schubert
I-292	Mr. Earl J. Purcell	I-339	Mr. M. Valenteyn Schut
I-293	Mr. Charles L. Raymond	I-340	Ms. Patrice Shawe
I-294	Ms. Deborah A. Reeder	I-341	Ms. Kay Shoemaker
I-295	Otto & Winifred Reuter	I-342	S. Paul & Marie Shuler
I-296	Ms. M. Tamara Rimes, Esq.	I-343	Ms. Millicent J. Singer
I-297 to I-298	Ms. Derry L. Riquelme	I-344	Ms. Carolyn Slaton
I-299	Mr. Jock Ritchie	I-345	Mr. Jason Slaughter
I-300	Ms. Tina M. Rizzo	I-346	Ms. Carol Smith
I-301	Ms. Grace A. Roberts	I-347	Mr. James Smith
I-302	Dr. E. B. Robinson, Jr.	I-348	Ms. Dianne Parrott Spook
I-303	Mr. Jose L. Rodriguez	I-349	Ms. Sheila Stark
I-304	Mr. Raul Rodriguez	I-350	Mr. Frank H. Staub
I-305	Ms. Bernice Rubin	I-351	Ms. Sheila Steinberg
I-306 to I-307	Mr. & Mrs. Dennis Russell	I-352	P. Stentz and family
I-308	Mr. James J. Ryan	I-353	Ms. Carol Stern
I-309	Ms. Karen L. Ryan	I-354	Ms. Sara Stern
I-310	Mr. Terry Sader	I-355	Mr. George L. Stetson
I-311	Mr. Robert Sadowski	I-356	Ms. Joanne Stevenson
I-312	Mr. Charles Salter, Jr.	I-357	Mr. Al Stewart
I-313	Mr. Harlee Samuels	I-358	Ms. Diana H. Storch
I-314	Ms. Ruth Samuels	I-359	Ms. Karen Stow
I-315	Mrs. Gertrude Sanders	I-360	Mr. Scott J. Stow
I-316	Ms. Lisa M. Sannasardo	I-361	Ms. Andrea Sturzen
I-317	Mr. Peter R. Sannasardo	I-362	Mrs. Grace E. Sutton
I-318	Dr. R. C. Sansing	I-363	Mr. John Sziber
I-319	Ms. Patricia Scarborough	I-364	Jack & Mary Tagge
I-320	Ms. Elizabeth Schane	I-365	Ms. Pauline Taisian
I-321 to I-329	Brian and Rosalyn Scherf	I-366	Ms. Elizabeth Leeds Tait
I-330	Ms. Carrie A. Schick	I-367	Ms. Kristen Talton
I-331 to I-332	Mr. E. K. Schluntz	I-368	The Taylor Family

NAMES OF COMMENTERS

I-369 to I-370	Ms. Carol Taylor	I-398	Mr. & Mrs. Brian Waterman
I-371	Mr. William Terry	I-399	Mr. Troy Webster
I-372 to I-374	Mr. Roderick Tirrell	I-400	Mr. Walter Weeks
I-375	Mr. Joseph L. Titus	I-401	Ms. Sylvia Weess
I-376	Ms. Yvette Toepfer	I-402	Ms. Gladys Weinberg
I-377	Mr. Peter Tolk	I-403	Ms. Marlene Weiss
I-378	Mr. Sten J. Tonessen	I-404	Mr. Arnie Welber
I-379	The Torrent Family	I-405	Mrs. Ginia Davis Wexler
I-380 to I-383	Ms. Lisa Turtle	I-406	Mr. Stephen Whitney
I-384	Mr. Fred Tutt	I-407	Ms. Michelle Whitt
I-385	Ms. Annette Ungerman	I-408	Mr. Daryl E. Wilcox, Esq.
I-386	Ms. Maggie Vail	I-409	Paul A. & Marie S. Willey
I-387	Ms. Kathleen Valentine	I-410	Ms. Wylene Williams
I-388	Ms. Jan Valliere	I-411	Mr. Mark G. Winder
I-389	Mr. C. Van Den Heuvel Jr	I-412	Mrs. Amy M. Windhorst
I-390	Mr. Raoul F. Van Ligten	I-413 to I-414	Ms. Jean Winter
I-391	The Varga Family	I-415	Ms. Alicia Witt
I-392	Mr. Ralph Ventinigig	I-416	John P. & Dametia Yianilos
I-393	Ms. Cecile R. Vogel	I-417	Mr. Lee Zausner
I-394	Mrs. Ann C. Vordenberg	I-418 to I-419	Mr. Evan Zekofsky
I-395	Mr. Michael Blaine Walder	I-420	Dr. Ingrida Zebelins and
I-396	Donald E. & Emily B. Walls		Mr. James Kolze
I-397	Ms. Diana D. Ward		

NO NAME/ADDRESS/ILLEGIBLE

Alphanumeric codes for correspondence received without a signature or other identification or where such identification was illegible are listed as follows. Alphanumeric codes are listed by presumed alphabetical order of surname or after identifying factors such as a picture post card.

I-421	"Mental Floss"	I-426	Soni?? Caragon?
I-422	Post Card (no picture)	I-427	Dan Vegala?
I-423	James L. S?????	I-428	Stacy UI?
I-424	Post Card (moose picture)	I-429	Joan Doxay?
I-425	Adam ta Daniel SIMJ?		

NAMES OF COMMENTERS

BUSINESS

Alphanumeric codes for correspondence received from businesses are listed in alphabetical order by name of the business. The signatory, where identified, precedes the business name.

B-1	Mr. Douglas A. Opell, Heritage Remediation/Engineering, Inc.
B-2	Parkins Marine, Inc.
B-3	Mr. Hugh Hoffman, President, Religious Vacations, Inc.
B-4 to B-5	Mr. R. F. Gardner, Shell Oil Company
B-6	Spellacy, Lescano and Duckett, PA

ORGANIZATION

Alphanumeric codes for organizations are listed in alphabetical sequence by name of organization. When correspondence was signed by an individual, that person's name is shown before the organization's name.

O-1	Ms. Patricia Meacham, Broward Audubon
O-2 to O-3	Mr. Tom Weise, Clean Water Action
O-4 to O-35	David Posnack Hebrew Day School, Fifth and Seventh Grades
O-36 to O-37	Ms. Dianne Petitjean, Environmental Coalition
O-38	Mr. R. P. Haviland, P.E., Environmental Council
O-39 to O-41	Environmental Leaders Council of South Florida
O-42 to O-51	Ms. Ann Whitfield and William A. Wood, Florida PIRG
O-52 to O-55	Mr. Joseph E. Podgor, Jr., Friends of the Everglades
O-56 to O-73	Ms. Joette Lorion, Greenpeace Advisor
O-74	Mrs. Winifred Reuter, Humanitarians of Florida, Inc.
O-75 to O-76	Ms. Kay Allen/Ms. Stephanie Pearson, League of Women Voters of Florida
O-77	Ms. Elizabeth C. Lemon, League of Women Voters of Monroe County
O-78 to O-80	Ms. B. Suzi Ruhl, J.D., M.P.H., Legal Environmental Assistance Foundation
O-81	Mrs. Hana Rosenberg, National Council of Jewish Women
O-82 to O-94	Northeast High School Ecology Club
O-95 to O-98	Ms. Catherine Dees, Save the Florida Panther
O-99 to O-101	Mr. Larry Marvet, Sierra Club

NAMES OF COMMENTERS

LOCAL GOVERNMENT

Alphanumeric codes for local governments are listed alphabetically. The signatory precedes local government identification.

LG-1 to LG-7 Mr. John P. Hart, Broward County Commissioner
LG-8 to LG-15 Ms. Mira Barer, Broward County, Dept. of Natural Resource Protection
LG-16 to LG-18 Mr. John J. Copelan, Jr., Broward County, Office of the County Attorney

STATE & REGIONAL GOVERNMENT

Alphanumeric codes for state and regional governments signatories are identified below.

SG-1 to SG-19 Governor Lawton Chiles, State of Florida
SG-20 to SG-21 Mr. John P. Hart, Chairman, South Florida Regional Planning Council
SG-22 to SG-23 Dr. John G. Dempsey, South Florida Water Management District

TRIBE

The alphanumeric code for correspondence received from a tribe is identified below.

T-1 Miccosukee Tribe of Indians of Florida

FEDERAL GOVERNMENT

Alphanumeric codes for correspondence received from Federal governmental agencies and signatories are identified below. Federal agencies are listed by alphabetical sequences.

FG-1 to FG-2 Mr. Mark H. Hibpshman, Bureau of Mines
FG-3 to FG-7 Mr. Heinz Mueller, Environmental Protection Agency (2 letters)
FG-8 Mr. Edward J. Kozalka, Geological Survey, Water Resources Division
FG-9 to FG-11 Mr. James W. Coleman, Jr., National Park Service

NAMES OF COMMENTERS

PETITIONS

Alphanumeric sequence for petitions, alphabetized by name, are listed below.

P-1	Broward Audubon, et al	P-6	Greenpeace
P-2	Linda Coxon, et al	P-7	Julia Pickett, et al
P-3	Earth First!	P-8	Jill Forsberg, et al
P-4	Friends of the Everglades	P-9	Helen M. Roeder, et al
P-5	Greenpeace	P-10	Charlotte R. Seely, et al

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SECTION 4

PUBLIC HEARING TRANSCRIPT

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PUBLIC HEARING

DRAFT ENVIRONMENTAL IMPACT STATEMENT

**APRIL 14, 1993
6:00 o'clock, P.M.
Fort Lauderdale Convention Center
Fort Lauderdale, Florida**

**Shell Western E&P Inc.
Miccosukee 3-1 Exploratory Well
Miccosukee Indian Reservation
Broward County, Florida**

**JAMES L. BYRNES
Chief Administrative Judge
U.S. Department of the Interior
ROBERT V. ABBEY, District Manager
Bureau of Land Management**

**JIM HARRIMAN
Bureau of Indian Affairs**

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Whereupon, the following proceedings were had:

JUDGE J. L. BYRNES: This Public Hearing will now come to order.

Good evening and welcome to the public hearing on the Draft Environmental Impact Statement addressing Shell Western E & P, Incorporated's proposal to drill an exploratory well at a site located in Section 3, Township 50 South, Range 35 East on the Miccosukee Indian Reservation located in Broward County approximately forty miles east of the City of Fort Lauderdale.

My name is James L. Byrnes. I am the Chief Administrative Judge for the Department of the Interior's Office of and Appeals.

Tonight's hearing is being conducted under the authority of the Federal Land Policy and Management Act and in accordance with established Department of Interior Procedures.

The purpose of this hearing is to receive testimony concerning the Draft Environmental Impact Statement.

Shell Western E & P, Incorporated submitted an application for a permit to drill to the Bureau of Land Management on January 17th, 1991. The Bureau of Land Management determined initially that an environmental assessment would be required and solicited public comment.

Public scoping was conducted by the Bureau of Land Management from March of 1991 through May of 1991. Substantial public opinion was expressed against the proposal due to public concerns about the Everglades and Big Cypress Swamp environments and other associated natural resources.

On April 16th, 1992 the Bureau of Land Management issued a Notice of Intent to prepare an environmental impact statement. The Notice explained that the decision to expand analysis from an environmental assessment to an environmental impact statement was not based on any changes in the proposal's anticipated impacts, but was made to recognize public concerns and to assure the public that any environmental impacts of the proposed - of the proposal would be thoroughly assessed.

The Notice further stated that any proposal for additional wells in production will require additional National Environmental Policy Act review and decision documents.

The purpose of this hearing is to receive the views, comments and suggestions of interested individuals and organizations on the adequacy of the Draft Environmental Impact Statement and to provide the Bureau of Land Management and the Bureau of Indian Affairs with additional information to help evaluate fully the suitability of the alternatives contained in the environmental impact statement and the adequacy of the draft.

This is not an adversarial proceeding. The purpose of this hearing is to receive information and not to exchange views. Your statement should be relevant to the Draft Environmental Impact Statement. And while this is a relatively informal hearing without the normal rules of procedure and evidence, the rules of common courtesy do apply.

The individuals here on the platform are representatives of the Bureau of Land Management and the Bureau of Indian Affairs. They may have questions which they may wish to address to the speakers in an attempt to better understand or clarify the views expressed.

We also have a court reporter here this evening who will make a verbatim transcript of the hearing. Everything that is said while the hearing is in session will be recorded.

In order to assure a complete and an accurate record of hearing, it is necessary that only one person speak at a time and that everyone remain as quiet as possible while the hearing is in process.

Transcripts of the hearing will be available from the court reporting company of Paragon Reporting Services located at 707 Southeast Third Avenue in Fort Lauderdale, Florida.

In the interest of time and orderliness I request that there be no display of approval or disapproval either by applause or otherwise during the presentations or at any time during the hearing.

Currently we have approximately thirty people who have indicated a desire to speak.

It is my intention to adjourn this hearing by 11:00 P.M. Therefore, I am requesting each speaker limit their oral presentations to ten minutes.

After hearing from those persons who have given advance notice, I will give all others present an opportunity to be heard if they desire.

Each speaker should begin their remarks by providing their name, their address and whom they represent.

If anyone is interested in submitting additional written comments on the Draft Environmental Impact Statement, they may send them to the District Manager, the Bureau of Land Management, 411 Briarwood Drive, Suite 404, Jackson, Mississippi, 39206.

If you have a copy of written comments that you would like to submit this evening, please provide them to me and I will see that they are included in the official record.

All written comments and statements must be received by the Bureau of Land Management no later than May 18th, 1993.

All written comments and statements received on time will be included as part of the official record and will be granted the same consideration as statements presented at this hearing. At this time I would like to introduce Mr. James Harriman, District Manager of the Eastern Area Office of the Bureau of Indian Affairs and Mr. Robert Abbey, the District Manager of the Bureau of Land Management of the Eastern States office. At this time Mr. Abbey would like to make an initial statement for the record.

Mr. Abbey.

MR. ABBEY: Thank you. Thank you.

We do have a signer coming -- She must be a little late -- for the hearing impaired. So if you can bear with us a little while, we should have that service available to our members of the public.

I'm going to keep my statement fairly brief because the purpose of us here tonight is to listen to you not vice versa.

The U.S. Department of the Interior, Bureau of Land Management and the Bureau of Indian Affairs have completed a Draft Environmental Impact Statement for a proposed exploratory well in Western Broward County. The purpose of the Draft Environmental Impact Statement is to provide the agency decision-makers with information upon which to base a decision regarding this proposal.

The Draft Environmental Impact Statement is not a decision document. This draft, which is dated March 8th, 1993, analyzes impacts of Shell Western's proposal to drill an exploratory well and test the potential hydrocarbon-bearing formations at a site located on the Miccosukee Indian Reservation.

Shell Western leases the project area from the Miccosukee Tribe of Indians of Florida.

The Bureau of Indian Affairs has a trust responsibility to the tribe to provide lease oversight. The Bureau of Land Management has a trust responsibility to review operational activities proposed under this lease.

Considerable public input has been received on this proposal and every effort has been made to identify and address the significant issues and concerns in this Draft Environmental Impact Statement.

Inter-disciplinary participation has been provided by the environmental consulting firm of Dames & Moore under a third-party contract.

The Draft Environmental Impact Statement has integrated to the fullest extent possible consultation, surveys and studies required under Federal law. The potential effects of the proposed exploratory well and water resources and wildlife are matters of heightened public concern. Therefore, we have expended considerable time evaluating possible effects on these resources.

The Draft Environmental Impact Statement finds that drilling of the proposed exploratory well would not have significant impacts on air quality, cultural resources, health and safety, noise, vegetation, visual resources, water resources, wetlands or wildlife.

Measures which would mitigate the short-term disturbances are recommended in this document and included in the preferred alternative.

We wish to emphasize the Draft Environmental Impact Statement is not a decision document. No exploratory drilling has been approved. Before a decision is reached the review process that we undertake to comply with National Environmental Policy Act has an intermediate step of releasing a draft document for public review. The public review will be used to revise the draft as needed and then prepare a final document. Only then will a decision be made on the merits of this proposal.

We also want to clarify just what this proposal is. The proposal is for one exploratory well. No decision regarding oil field development would be made without additional environmental analysis and public review.

Be assured that the Miccosukee Indian Tribe, the Bureau of Indian Affairs and Bureau of Land Management officials are all sensitive to the public's concerns and that strict compliance with National Environmental Policy Act will occur to insure that whatever decision is finally made will be one that considers the impact of the proposal on the Everglades ecosystem.

JUDGE J. L. BYRNES: At this time I would like to call the first speaker Mr. James Goldsich with Broward County. I apologize in advance to anyone whose name I accidentally mangle during the course of the hearing.

MR. GOLDSICH: All right.

JUDGE J. L. BYRNES: Sir, if you would state your name and your address and who you represent, if you would, for the record.

And would you mind spelling your name for the benefit of the court reporter.

Thank you.

MR. J. GOLDSICH: My name is Jim Goldsich. I'm Director of Biological Resources for Broward County, Department of Natural Resources Protection.

Spelled G-O-L-D-S, as in Sam, I-C-H.

The address of my office is 500 East Broward Boulevard in Fort Lauderdale 33394.

I have some comments that I'd like to bring to this board tonight. Commissioner Hart had hoped to deliver these, and he has a 7-page letter that contains the specifics of those comments that I'll leave with the group this evening. But he has asked that I highlight some of those comments for this proceedings.

On January 23 of '92 Commissioner Hart provided a letter, pursuant to this process, that indicated we felt there were very real cause for concern from this project in the areas of surface and groundwater contamination wetlands and wildlife contamination, ambient air impacts from the operation, and cumulative impacts from the from the realized segmentation of not analyzing something beyond an exploratory well.

In our review of the current document we find that those flaws still exist. We find that - particularly in the area of cumulative impacts from moving to a production well beyond just an exploratory well and the transportation of materials to and from even the exploratory well - there was not adequate consideration given to the potential impacts to the Everglades ecosystem. In the area of well construction and abandonment, we find that not adequate consideration was given to the potential impacts in the site of the well and off-site on the haul roads and along existing roads and travel corridors.

The water resources map that was utilized in the analysis used a 1978 depiction of where the Biscayne aquifer lies, excuse me, in relation to the proposed project. We find that there are more recent maps indicating that the Biscayne aquifer is actually two to three miles from the proposed well site and not five to ten as the document indicates. This gives us great cause for concern with respect to potential impacts and the analysis that was given to those.

In closing, we find that a lot of the analyses that were included in the document may have been seeded and discounted as the visual resources impact from a 170-foot tower has been discounted in the Everglades by the statement that's contained in the document that says: Observers may not perceive any reduction in visual quality and may even consider the rig, this 170-foot tall rig, a novel site, adding variety to an otherwise monotonous and boring landscape.

We, in Broward County, don't consider the Everglades to be a monotonous and boring landscape.

We hope that Mr. Babbitt in his statement that the Everglades has a major priority of this new administration is not an example of the direction that he's planning to take.

I'd also like to indicate that on March 23 of 1993 the Broward County Board of County Commissioners passed a resolution that opposes the draft impact statement, and that based on the premise that an exploratory well in the vicinity of Water Conservation Area 3 could have significant ongoing effects to the Broward County's water supply. That the Broward County Board of County Commissioners authorizes the Department of Natural Resources Protection, County Administrator and other staff to do everything necessary to prevent such drilling. Thank you.

JUDGE J. L. BYRNES: Thank you for your comments.

(Applause.)

JUDGE J. L. BYRNES: At this time if Mr. Steve Terry could come forward, please. If you could state your name and address for the record please.

MR. S. TERRY: My name is Steve Terry. I'm the Land Sources Manager for Miccosukee Tribe of Indians of Florida. Our mailing address is P.O. Box 440021, Miami, Florida. Zip code is 33144.

I have a statement that the Tribe would like to make which is titled Statement of the Miccosukee Tribe of Indians of Florida Concerning the Environment Impact Statement Prepared for the Bureau of Land Management and Bureau of Indian Affairs regarding the Shell Western drilling permit application.

The Miccosukee Tribe of Indians of Florida is pleased that the draft of the environmental impact statement regarding possible drilling on the Miccosukee Federal Reservation has been completed and is now available for public comment.

We hope our South Florida neighbors will carefully review this document and offer responsible comment about it and the process by which it was produced.

The Miccosukee Tribe decision to determine whether its reservation has mineral potential has been the subject of some measure of opposition by members of the public. One of the fears that has been expressed concerns whether such activity would harm the Everglades ecosystem.

The Tribe must emphasize again its firmly established policy that any activity conducted on its Reservation may proceed only in an environmentally sound manner.

The Tribe required that its lessee, Shell Western, design a plan complies fully with all applicable environmental laws and regulations and has encouraged, indeed demanded that the Federal regulatory agencies strictly enforce these requirements.

The EIS evaluates the plans in detail and measures them against the legal requirements and concludes that there will be no significant adverse impacts.

We hope everyone will read this analysis.

A fear was also expressed that the proposed project could endanger the underground aquifer that supplies the drinking water to Southeast Florida.

The EIS reveals that this aquifer lies several miles to the east of the drilling target and therefore will not be impacted.

The Miccosukee Indians, as much as - if not more than - any other citizen of Florida treasure the Everglades. It has been our homeland for generations.

This exploratory well is in a cow pasture in a fringe area of the Everglades.

Some areas of our Reservation have been victimized by the pollutants introduced north of us, and we are actively engaged in efforts to stop this contamination and restore the quality of our water resources. We are committed this effort. And we can assure all of our neighbors that this commitment extends to making certain that any drilling activities that the Federal authorities may permit shall be carried out in strict and total compliance with Federal requirements.

Miccosukee Tribes Reservation is small, particularly when compared with the vast areas of Florida our ancestors occupied. Thus we must make maximum use of the land base we have.

Our decision to look for mineral resources is not new to South Florida. Exploration for oil has been going on there for more than forty years, and oil production goes on there today. If we have mineral resources, we want to use them to help improve the health, housing and education of the Miccosukee people. The tribe has a legal right to do so.

We are, however, keenly aware of our responsibility to act at all times in a prudent manner that will not harm our people, our neighbors or our homeland. Thank you.

JUDGE J. L. BYRNES: Thank you for your testimony.

The next speaker is Mr. Ralph Prescott. If you would come forward please.

MR. R. PRESCOTT: My name is Ralph Prescott. I live at 4950 Northwest Sixth Street in Coconut Creek, Florida.

Never been to one of these meetings before. I wasn't sure if it was a question-and answer or not. I have no prepared speech. I just want to say a couple of things.

I'm not sure why Shell Oil Company happened to pick the Everglades. All I know is that with the way everything is going around in South Florida between the concern for all the other different things that regards the environments between the coral reef and everything, I don't think it's right that the Miccosukee Indian Tribe gave you permission or anybody else permission to go and drill into Florida ground, even if this is on the Reservation.

I just think that if anything was to happen, if I couldn't ask you the question if you did find oil, you would probably put up a rig and drill. But if there was an accident and it went past the seven miles or five miles, whatever it is, and goes into the aquifer, who's going to pick up the tab for the water for the people of South Florida?

We got no say-so. We pay taxes. We got no say-so. People come in. You to Miccosukee Indian tribe and they say, Okay. Go ahead. You got our permission."

The only thing I'd like to say is that I think the people of South Florida or anybody just wants to protect what we do have.

And as far as putting up an oil rig, I think it's going to be a big eyesore. I don't care how you decorate it.

And the only other closing statement I have, I'm against it. I'm going to try and put all my resources for the people with Animal Rights Foundation of Florida, which my wife and I belong to. And I just wish that Miccosukee Indian Tribe would take another outlook and say no to this. Because I think they're making enough money off the bingo and cigarettes they're selling anyway.

That's all. Have a good evening.

(Applause.)

JUDGE J. L. BYRNES: Ladies and gentlemen, I don't want to stay here any later tonight than most of you do. So the sooner we get through this, the easier it will be for all us.

A VOICE: Leave the glades alone.

JUDGE J. L. BYRNES: Next speaker is Virginia - Virginia Braison.

A VOICE: Polite people get poisoned.

JUDGE J. L. BYRNES: I would ask that you extend courtesy to the people who are speaking. If you wish to speak, I'll give you the opportunity to do so later in the hearing.

Welcome.

MS. V. BRAISON: Good evening.

JUDGE J. L. BYRNES: If you could state your name and address for the record please.

MS. V. BRAISON: I'm Virginia Braison, 2650 Northwest 49th Avenue in Lauderdale Lakes.

JUDGE J. L. BYRNES: Thank you.

MS. V. BRAISON: Okay. Biologists have found that mercury has mysteriously intruded into the Everglades. All the freshwater fish have elevated levels, and it's making its way up the food chain to wading birds. And it's even killed an endangered Florida panther.

If we were to have another hurricane with flood waters encroaching the drilling sites, the proposed four-foot high berm surrounding it could not possibly hold the water back. This would be a disaster.

And even though we do need fuels and oils, we feel there could be other alternative ways of finding them. This is not the place. Too many lives are at stake and we have to reject a false choice between economic growth and environmental protection. Thank you.

JUDGE J. L. BYRNES: Thank you for your testimony.

(Applause.)

JUDGE J. L. BYRNES: The next speaker is Kathy Harrison.

MS. K. HARRISON: My name is Kathy Harrison. 6825 Northwest 9th Court in Margate. My concern last - at the last meeting like this was, essentially, the water supply. As a member of both Audubon and Sierra, I have other environmental questions, too. I think after thinking about this for quite awhile that now the basic thing is: This all sounds good. And I was on the reservation and had a tour of the site. And I really felt in some ways quite reassured that this would be safe.

However, we all know what's happened in Alaska. And I don't mean the Valdez. I mean what's happened up on the northern slope.

Granted, this is a totally different ecosystem; but I think it's just as fragile. Maybe more so. And I'm just concerned that, you know, not all the possibilities can be covered.

And I just feel that it really shouldn't be done.

Thank you.

JUDGE J. L. BYRNES: Thank you for your testimony.

(Applause.)

JUDGE J. L. BYRNES: Next speaker is Mr. Joe Podger.

MR. J. PODGER: This is for the record. That's a copy of it.

JUDGE J. L. BYRNES: Great.

MR. J. PODGER: Mr. Byrnes, Mr. Abbey, Mr. Harriman, I'm Joe Podger representing the Friends of the Everglades and Marjory Stoneman Douglas - our founder - here this evening.

(Applause.)

MR. J. PODGER: The documents I handed you just now that I want to draw your attention to is a letter which essentially is asking you to open up a new avenue of inquiry for us, being the Federal representatives here. This may well be best conveyed along to the EPA Administrator.

We are asking you that under Section 1424 (e) of the Safe Drinking Water Act that the Federal government, through its agent, the Administrator of the EPA, begin a review under the Section called the Sole Source Review.

We understand that if the contamination that we anticipate from such a project and its connected activities contaminates the aquifer in a way that may create a significant hazard to public health, the EPA has the right, thanks to a petition we filed and won in 1978 - with Marjory signing it - to veto Federal assistance to any project that would be thus dangerous.

We want you to extend the period for comment for 60 days to get EPA to conduct that review, and would ask you to convey this message to them and the material that you would have that they would need to begin such a review.

The reason for this specific attention to drinking water, not only because of our long-term interest in it, is the fact that as looking over the environmental impact statement document we find a number of statements that disturbs us.

First, we think there is a discrepancy between what we know date 1993 and what the maps in the document which come from 1978 -- In fact, they were prepared for the very study that was used to give EPA the info to make the sole source designation -- have changed quite a bit.

This data, we believe, will show you today that there is more hydrologic connection between the gray limestone aquifer in the Biscayne, the exploitability of the gray limestone aquifer downstream in the Dade and Broward County areas and the future plans that may be looked to use that as a supplemental water supply for those regions.

And, also, because of another problem. The document states that there is no drainage to the east and south from the site.

We find that looking at what's in the book, this has got to be an impossibility. If, in fact, the site is dry, it has to drain. And all of the patterns in the drawings in the document show it draining to the canals on the east and on the south. And those, in turn, connect through the S-140 structure pumping into C-60. And C-60 goes under I-75 to the spreader canal, and hence overland across the Conservation Area 3. If it hits Conservation Area 3, it has to make its way into there charge of the Biscayne Aquifer, even if it's 10 miles away or 20 miles away. So even with that, you have a connection. And I think the document is in stark error on that and needs to be investigated by a sole source review to get the groundwater experts on the job.

(Applause.)
Secondly, there is a massive authority for a restudy of the Everglades. The Army Corps of Engineers has been given the authorization -- Although no money yet -- to redo the analysis, the diagnosis of the Everglades ills, from Orlando to Key West.

When this study lands and if we get what we hope will happen -- And it's a full restoration of the Everglades as Secretary Babbitt has said should happen someday -- then we know there's going to be a whole lot different in the way water moves throughout this region. And putting this installation there, based on present conditions, even if they're erroneously reported, will definitely not wash when the River of Grasses are restored and allowed to flow again.

You cannot rely given the fact that authorization and that study is on the table now on present-day circumstances for future consequences and a decision at this time on this kind of project in this location would be a disaster.

Secondly, this is the first such well in the Everglades. We are talking about something that we were told by the administration of this country - the new administration - was going to be a priority. That restoring the Everglades was the subject matter of a high level task force.

We put it to this administration that it's insanity to consider drilling for oil and the consequential possibility of production wells in this very same Everglades.

This is the most endangered ecosystem in the country. It is home to the most endangered national park in country. It is the subject of the most ambitious and perhaps the most forward-thinking restoration program in the world. And it is, as Marjory Stoneman Douglas said in the opening line to the book, "the only Everglades in the world."

To risk it with this kind of activity when there are other places on this planet and in this country to obtain oil is a travesty. It's a policy issue --

(Applause.)

-- that has to be taken seriously. You're looking at a situation where the alternatives are part of the deeper process. And you're supposed to be looking at these alternatives as a part of this hearing. This book here that we have before us does a wonderful job of outlining many, but not all, consequences of three alternatives:

Drilling with a road here, drilling with a road there, and drilling with a road somewhere else. It doesn't talk to you about alternatives for producing the welfare to the public, the NEPA process it's supposed to produce and protect. Namely, how else do you meet the energy needs without drilling at all?

Could it be that there are better places less sensitive to obtain oil that the BLM and the United States Government can find permits for to produce the needs that the public enjoys?

Could it be that conservation of energy or something besides petroleum products would be the way to go?

(Applause.)

We do not have that analysis here. And it cannot be part of a decision if it's not in the book.

In closing, I just have to tell you that we have a lot of slogans. And one of them we give out frequently is that the "Everglades is a test. If you pass it, you get to keep the planet."

Well, this oil well application is a test of the resolve of the Administration of the United States Government, of the Department of the Interior and of us citizens who have been basically tested to see if we would come out for such an outrageous proposal.

We have. We're here. We're looking forward to giving you our extended comments and we hope we'll get an extended deadline.

And I want you to know that we probably are going to persevere - I know many of these people will say they're not going to go away - because we don't want the Glades to go away.

And we thank you for your time.

(Applause.)

JUDGE J. L. BYRNES: Thank you for your testimony.

The next speaker is Mr. Carl Perry. Mr. Perry, if you would step forward.

MR. C. PERRY: Good evening. My name is Carl Perry. I live at 114 Manatee Avenue, Coral Gables, Florida. And I am the South Florida Field Organizer for the Florida Public Interest Research Group or Florida PIRG. Florida PIRG is a non-profit, nonpartisan environmental and consumer group with over 60 thousand members from Key West to Pensacola.

Over the last ten years Florida PIRG has led the campaign to protect the Florida's coasts from the hazards of offshore oil and gas drilling. As a result of our work opposing offshore oil drilling, I would like to testify against the proposed on-shore oil drilling in the Everglades.

(Applause.)

MR. C. PERRY: Florida PIRG is always opposed to oil drilling in sensitive parts of our State's beautiful coastline, the Keys, the coral reefs, the Everglades coasts lined with mangroves and the estuaries and marshes of the Panhandle. That is why we oppose oil drilling in an ecosystem as fragile as the Everglades.

Oil drilling is dirty business, plain and simple. The track record speaks for itself: Santa Barbara blowout. Exxon Valdez. Hickstock blowout in the Gulf of Mexico. Oil companies are proven to be very bad corporate citizens; despoiling the ecosystems they pledge to protect.

Allowing further oil industry activity in an already stressed ecosystem like the Everglades is, at best, inadvisable and, at worst, ludicrous.

Routine leaks in spillage could threaten the already polluted River of Grass. Oil drilling pollution could not only threaten the Everglades but the Biscayne Aquifer, as well, the main source of South Florida's drinking water.

Perhaps the bottom line on drilling anywhere in Florida is that it is not needed, and it will not solved our nation's energy problems.

The Federal Government estimates that oil and gas thought to be on- and offshore in Florida is equivalent to about two months' worth of domestic energy consumption.

Why risk the Everglades' unique and fragile environment and South Florida's drinking water for a few days' worth of oil or natural gas?

(Applause.)

MR. J. PODGER: The documents I handed you just now that I want to draw your attention to is a letter which essentially is asking you to open up a new avenue of inquiry for us, being the Federal representatives here. This may well be best conveyed along to the EPA Administrator.

We are asking you that under Section 1424 (e) of the Safe Drinking Water Act that the Federal government, through its agent, the Administrator of the EPA, begin a review under the Section called the Sole Source Review.

We understand that if the contamination that we anticipate from such a project and its connected activities contaminates the aquifer in a way that may create a significant hazard to public health, the EPA has the right, thanks to a petition we filed and won in 1978 - with Marjory signing it - to veto Federal assistance to any project that would be thus dangerous.

We want you to extend the period for comment for 60 days to get EPA to conduct that review, and would ask you to convey this message to them and the material that you would have that they would need to begin such a review.

The reason for this specific attention to drinking water, not only because of our long-term interest in it, is the fact that as looking over the environmental impact statement document we find a number of statements that disturbs us.

First, we think there is a discrepancy between what we know done 1993 and what the maps in the document which come from 1978 -- In fact, they were prepared for the very study that was used to give EPA the info to make the sole source designation -- have changed quite a bit.

This data, we believe, will show you today that there is more hydrologic connection between the gray limestone aquifer in the Biscayne, the exploitability of the gray limestone aquifer downstream in the Dade and Broward County areas and the future plans that may be looked to use that as a supplemental water supply for those regions.

And, also, because of another problem. The document states that there is no drainage to the east and south from the site.

We find that looking at what's in the book, this has got to be an impossibility. If, in fact, the site is dry, it has to drain. And all of the patterns in the drawings in the document show it draining to the canals on the east and on the south. And those, in turn, connect through the S-140 structure pumping into C-60. And C-60 goes under I-75 to the spreader canal, and hence overland across the Conservation Area 3. If it hits Conservation Area 3, it has to make its way into there charge of the Biscayne Aquifer, even if it's 10 miles away or 20 miles away. So even with that, you have a connection. And I think the document is in stark error on that and needs to be investigated by a sole source review to get the groundwater experts on the job. (Applause.)

Secondly, there is a massive authority for a restudy of the Everglades. The Army Corps of Engineers has been given the authorization -- Although no money yet -- to redo the analysis, the diagnosis of the Everglades ills, from Orlando to Key West.

When this study lands and if we get what we hope will happen -- And it's a full restoration of the Everglades as Secretary Babbitt has said should happen someday -- then we know there's going to be a whole lot different in the way water moves throughout this region. And putting this installation there, based on present conditions, even if they're erroneously reported, will definitely not wash when the River of Grasses are restored and allowed to flow again.

You cannot rely given the fact that authorization and that study is on the table now on present-day circumstances for future consequences and a decision at this time on this kind of project in this location would be a disaster.

Secondly, this is the first such well in the Everglades. We are talking about something that we were told by the administration of this country - the new administration - was going to be a priority. That restoring the Everglades was the subject matter of a high level task force.

We put it to this administration that it's insanity to consider drilling for oil and the consequential possibility of production wells in this very same Everglades.

This is the most endangered ecosystem in the country. It is home to the most endangered national park in country. It is the subject of the most ambitious and perhaps the most forward-thinking restoration program in the world. And it is, as Marjory Stoneman Douglas said in the opening line to the book, "the only Everglades in the world."

To risk it with this kind of activity when there are other places on this planet and in this country to obtain oil is a travesty. It's a policy issue --

(Applause.)

-- that has to be taken seriously. You're looking at a situation where the alternatives are part of the deeper process. And you're supposed to be looking at these alternatives as a part of this hearing. This book here that we have before us does a wonderful job of outlining many, but not all, consequences of three alternatives:

Drilling with a road here, drilling with a road there, and drilling with a road somewhere else. It doesn't talk to you about alternatives for producing the welfare to the public, the NEPA process it's supposed to produce and protect. Namely, how else do you meet the energy needs without drilling at all?

Could it be that there are better places less sensitive to obtain oil that the BLM and the United States Government can find permits for to produce the needs that the public enjoys?

Could it be that conservation of energy or something besides petroleum products would be the way to go? (Applause.)

We do not have that analysis here. And it cannot be part of a decision if it's not in the book.

In closing, I just have to tell you that we have a lot of slogans. And one of them we give out frequently is that the "Everglades is a test. If you pass it, you get to keep the planet."

Well, this oil well application is a test of the resolve of the Administration of the United States Government, of the Department of the Interior and of us citizens who have been basically tested to see if we would come out for such an outrageous proposal.

We have. We're here. We're looking forward to giving you our extended comments and we hope we'll get an extended deadline.

And I want you to know that we probably are going to persevere - I know many of these people will say they're not going to go away - because we don't want the Glades to go away.

And we thank you for your time.

(Applause.)

JUDGE J. L. BYRNES: Thank you for your testimony.

The next speaker is Mr. Carl Perry. Mr. Perry, if you would step forward.

MR. C. PERRY: Good evening. My name is Carl Perry. I live at 114 Manatee Avenue, Coral Gables, Florida. And I am the South Florida Field Organizer for the Florida Public Interest Research Group or Florida PIRG. Florida PIRG is a non-profit, nonpartisan environmental and consumer group with over 60 thousand members from Key West to Pensacola.

Over the last ten years Florida PIRG has led the campaign to protect the Florida's coasts from the hazards of offshore oil and gas drilling. As a result of our work opposing offshore oil drilling, I would like to testify against the proposed on-shore oil drilling in the Everglades.

(Applause.)

MR. C. PERRY: Florida PIRG is always opposed to oil drilling in sensitive parts of our State's beautiful coastline, the Keys, the coral reefs, the Everglades coasts lined with mangroves and the estuaries and marshes of the Panhandle. That is why we oppose oil drilling in an ecosystem as fragile as the Everglades.

Oil drilling is dirty business, plain and simple. The track record speaks for itself: Santa Barbara blowout. Exxon Valdez. Hickstock blowout in the Gulf of Mexico. Oil companies are proven to be very bad corporate citizens; despoiling the ecosystems they pledge to protect.

Allowing further oil industry activity in an already stressed ecosystem like the Everglades is, at best, inadvisable and, at worst, ludicrous.

Routine leaks in spillage could threaten the already polluted River of Grass. Oil drilling pollution could not only threaten the Everglades but the Biscayne Aquifer, as well, the main source of South Florida's drinking water.

Perhaps the bottom line on drilling anywhere in Florida is that it is not needed, and it will not solved our nation's energy problems.

The Federal Government estimates that oil and gas thought to be on- and offshore in Florida is equivalent to about two months' worth of domestic energy consumption.

Why risk the Everglades' unique and fragile environment and South Florida's drinking water for a few days' worth of oil or natural gas?

(Applause.)

There are solutions for meeting America's energy needs that are cheaper, safer and faster than drilling in sensitive areas for non-renewable and polluting fossil fuels. Why should this environmental impact statement look at these alternatives as, quote, "alternatives considered, but not analyzed in detail." I urge you not to approve the Shell application for drilling in the Everglades.

Thank you for the opportunity to testify.

(Applause.)

JUDGE J. L. BYRNES: Thank you for your testimony.

The next speaker is Mr. Larry Marvett.

MR. L. MARVETT: Hello. My name is Larry Marvett. I'm the Conservation Chair for the Broward Sierra Club. My address: 9437 Northwest 45th Street in Sunrise. I'll be giving you the official comments for the Broward group of Sierra Club.

A few weeks ago Interior Secretary Bruce Babbitt came to Florida and announced that the Interior Department would be working hard to restore the Everglades. Maybe Mr. Babbitt hasn't spoken with you yet or maybe the Everglades are not too important where you live in Mississippi and Virginia. But this environmental impact statement is nothing but a rubber stamp for Shell.

(Applause.)

The issue here is not whether Shell can drill one small hole in Florida, but whether oil production and other industrial activity should be allowed in the Everglades at all. Especially considering how sick the Everglades is.

We're outraged that this important issue, industrialization of the Everglades, could be treated so casually by a Federal agency committed to Everglades restoration.

A serious EIS would present and discuss - at length - viable alternatives. With one sentence you eliminate the no-drilling alternative. With three sentences you cancel any consideration of energy efficiency alternatives. And the alternatives you do consider are exactly the same as the original Shell plan.

Apparently the BLM and BIA see environment impact statements as busy-work; something to complete as quickly as possible and check off as part of the permit process.

We don't see it that way. We expect and we demand that the process take in all the issues and evaluate serious alternatives. If you are serious in your evaluation of the impacts of this plan on our environment, you would not separate the exploratory well from production wells. And if you were serious in your concern, you would evaluate Shell's scheme with respect to the Everglades restoration plans, which completely void your assumptions.

And if you really saw the EIS process as a way to inform the public, you would show us how the impact of this project would combine with other problems to affect the Everglades.

Your separation of exploratory well from production drilling shows how disingenuous this EIS is.

You state that this well is highly speculative and not likely to be economically feasible. So Shell's plan does not depend on production for its justification. Yet this well is no more speculative than any wildcat well. And I think we can depend on Shell's business sense when it comes to spending five million dollars for a well. And Shell's multi-billion dollar size certainly indicates that drilling is economically feasible.

However, I'd like to think this is highly speculative. If I can imagine a company like Shell throwing away \$5,000,000 for the fun of it, maybe I could also imagine the Interior Department taking a serious look at the consequences of this plan on the Everglades.

In this fictional universe the environmental impact statement would be more than a rubber stamp; it would be a document that the citizens of Florida could read and understand the true risks associated with such a project.

This EIS is fatally flawed and must be rewritten. The Broward Sierra Club urges you to take a closer look at this problem. Please provide us a document that seriously addresses all the issues involved here.

Thank you.

(Applause.)

JUDGE J. L. BYRNES: Thank you for your testimony. The next speaker is - I think it's Jolette Lorikone.

MS. J. LORION: Joette Lorion.

JUDGE J. L. BYRNES: Lorion. Okay.

A VIDEOGRAPHER: Spell it for us please.

MS. J. LORION: Yeah. It's J-O-E-T-T-E, L-O-R-I-O-N. 7269 Southwest 54th Avenue, Miami, Florida. 33143.

First of all, I'm Vice President of Friends of the Everglades. And I would just like to second all of the comments that Joe Podger made about my concerns about the water.

But I will be tonight speaking to you about really my area of expertise. I'm energy advisor for Greenpeace's Atmosphere and Energy Campaign.

I read the EIS. I'm deeply disturbed by the grossly inadequate manner in which it looked at alternatives, including energy efficiency to drilling.

I think that the report that I read is long on conclusions and short on support for those conclusions. It seemed a little bit like the adhesion syndrome. Let's all stick together and tell the same story. And that story is that it's okay to drain this pristine area. And that concerns me.

The other thing that concerns me is that Dames & Moore got about a half million dollars to do this report. And I would just like to ask you if you know of any incidents where companies where the company that was hired to do the report for the oil company has come up with the conclusion that they should not drill in that area. Does anybody up there know that?

(Applause.)

MS. J. LORION: One thing I would - I would clearly suggest is that individual actions that are logical parts of a chain like drilling an exploratory hole and drilling for oil should be really evaluated in a single-program statement that looks at all those environmental effects.

I believe the alternatives should be looked at right now because once we're down the line and we've spent a lot of money, then we have less flexibility in doing that.

The courts have recognized under NEPA that the alternatives must be considered and that you can't just slosh them off by saying that, "We looked at them, but we can't make people conserve." That's not the point. The point is that there are alternatives to drilling for oil or using oil.

I believe that the environmental impact statement should be assigned to a group designated by the President that has responsibility for analyzing overall energy questions for this nation. We now have an Administration who - in their campaign literature at least - said they wanted to reduce energy consumption by 25 percent by, I believe, the year 2005 or 2025. I can't remember. So if that is, indeed, their goal, then we may not have to drill for this oil.

So generally the EIS did not adequately consider alternatives as required by 102 C-3 and 102-D of NEPA. And they didn't look at some methods that could curtail the need - curtail the need for oil. And energy conservation would have a very important role, I think, if we looked at that.

For instance, I have in my hand a compact fluorescent light bulb. If half of the homes in Florida installed this light bulb, we could negate the need for one medium size or large size oil power plant. So we could displace that need for oil. We know if we get more efficient automobiles, that if we even increase the fuel efficiency by one mile per gallon, we can save 420,000 barrels of oil a day. And we are looking at cafe standards and setting those kinds of standards.

We know in -- And I brought you pages of some of these reports because I want you to know they exist because we don't have to make this choice. There are reports in Florida, for instance, after Hurricane Andrew there was a report done for the Department of Energy that showed that it was technically feasible to rebuild the houses in the hurricane region and save 73 to 84 percent of the electricity. Now, the economically cost-effective savings would range from 39 to 48 percent. But that's a lot. So I'm going to give you that report.

Another report, which is a draft report, shows that if we encouraged conservation and efficiency in Florida, by the Year 2000 we could save ten thousands megawatts of power. That displaces the need for a lot of oil.

Even air conditioning ducts in our homes have leaks, and there's a report that was done in Florida that showed if we repair duct leaks in three million homes in Florida, we could reduce the winter peak demand by 5,00025 megawatts and - or 13 percent of our State's generating capacity.

Nationally Union of Concerned Scientists did an excellent report called America's Energy Choices. And one thing nobody's addressed here is that we're drilling for this oil that's going to be burned somewhere that's going to put more carbon dioxide in the atmosphere that can contribute to global warming.

While the UCS report looked at that we can reduce CO-2 levels by seventy percent by the Year 2030 and we could decrease the nation's petroleum consumption to one-third of current levels by the Year 2030, consumers would save five trillion dollars in fuel and electricity costs, and it would cost us 2.7 trillion. So we would have

a net savings of 2.3 trillion dollars. So I think we need to look at the economics benefits of other energy forms in not drilling for oil and also the environmental benefit.

Each barrel of oil consumed emits 850 pounds of carbon dioxide and- and, you know, we really have to think about - have a holistic look at this. And, you know, the Everglades, as Joe said, and Marjory Stoneman Douglas's book, there are no other Everglades in the world. Why do we want to drill in the Everglades of all places? Even if we are fixed on oil and we think we need it.

I think we don't need it and I think nationally we don't need it. I think that you need to go back, now that these issues have been raised, and look at doing a statement that includes not only the exploratory drilling, but the oil production and then look at the alternatives to that. I think that's really a must.

One last thing that concerns me is that -- And we're going to prepare written comments. So I'm just shooting from the hip here. But, you know, it's long held that we can proceed with lease sales before environmental studies are complete and that leasing is separate from development. By the National Research Council did a study in 1989 that pointed out that the Interior Department has never refused an industry development and production plan out of hundreds submitted. In other words, to lease is to drill and to develop.

So, you know, I think that doing this in an incremental fashion is really unfair to the public. And when I was going over the EIS this morning my daughter came in. And we would have gone to the Everglades on Saturday sloshing. We have a wonderful time in this beautiful environment. And she said, "Well, Mom, what are you doing?" And I said, "I want to show you this." I showed her the map. And I said, "They want to drill for oil in the Everglades."

And she said, "That's stupid." Out of the mouth of the babes. And, you know, I mean, I wish I thought that one up.

So I just, you know, I want to leave you with that Greenpeace will be submitting extensive comments. We really need to get out of this dinosaur mentality that the only thing we can do is drill for and burn oil. There are plenty of other things we can do. And I hope that this Administration will look at doing them.

And, finally, I would like to leave you with this bottle of snake oil. Because if you can sell drilling in the Everglades to the public, you can sell anything.

Thank you.

(Applause.)

JUDGE J. L. BYRNES: The next speaker is Barbara Ziess.

MS. B. ZIESS: Good evening. My name is Barbara Ziess. I reside at 4030 Northeast 17th Terrace in Oakland Park. I'm President of Broward County Audubon Society and I'm here speaking on behalf of that organization tonight. The Broward County Audubon Society is opposed to the permitting of this well. And although the EIS tends to minimize the impact of this well, our concerns loom large.

We are concerned about the policy that will be set here if this well is permitted. Does the United States Government have the right to make a policy decision that could have an adverse effect on the environment and could be a detriment to the public welfare?

We are concerned about the precedent that will be set here if this well is permitted, i.e., the citing and permitting of wells and water conservation in other environmentally sensitive areas.

We are focused on the permitting of a particular well, but the scope is much larger. The real issue is whether or not an oil company can get a permit to drill in such a sensitive area. Because if they can get one here, they can get one anywhere.

So, ultimately, the question before us tonight becomes: Are we willing to develop a field of oil wells in this area if this well strikes oil?

If the answer to this question is no, then why permit this well at all?

We are also concerned about the waste, the water and the wildlife. With regard to the waste, we are concerned about contaminants and their disposal. That oil and gas are exempted from Super Fund deep well injection and certain Resource, Conservation and Recovery Act regulations does not make the disposal of these wastes less dangerous.

Pumping waste into lower aquifers could ruin future water supply.

We find the Oil Spill Contingency Plan unsatisfactory. Past spills are not analyzed in the EIS nor are the cumulative impact of drilling in the Everglades ecosystem. What are the consequences to the site? And who has financial responsibility, and to what extent, in the event that something goes wrong? With regard to the water, we

are definitely concerned about our drinking water. Additionally, the groundwater inventory is incomplete. We feel that this could not only jeopardize the surface water, but place future water supplies at risk. We feel that the EIS does not adequately address the drainage issue and no mention is made of restoration water flows.

We are also deeply concerned about the impacts to wildlife. The Everglades' ecosystem functions in such a delicate balance and is already mortally stressed. Can the Everglades kite, the ibis and the wood stork survive another insult to the system?

And what about the panther? The EIS seems to evidence that, indeed, they would be impacted by this well.

Just how much oil is the Everglades worth? For anyone in this audience that needs coaching, the answer is: Not one drop.

Finally, we object to the conclusion that the use of alternate energy sources does not - does not have to be considered here. As the millennium ends, man must look to the future. A future that cannot continue our dependence on fossil fuels unless man, himself, becomes the next dinosaur.

Thank you.

(Applause.)

JUDGE J. L. BYRNES: Thank you for your testimony.

The next speaker is Edwin O'Toole.

MR. O'TOOLE: Thank you, Mr. Chairman. And Mr. Byrnes.

My name is Edwin O'Toole. I live at 4019 West Park Road in Hollywood, Florida. I own land in the Everglades and I'm a businessman and represent myself as a citizen.

I really want to thank Dames & Moore for doing such a beautiful job. They covered every aspect that you could. Except maybe for an observation tower for people to watch the operation going on. But I think that Dames & Moore covered it real well.

And, you know, if we really want to get down to basic facts, this land is owned by the Indians. The Indians want the oil. They own the oil rights. And they want to expand what they have: Their schools, their churches, their roads.

Who are we to deny them this? The State of Florida could use the money as they tax the oil companies. They can't tax the Indians. We need it for the infrastructure of the State of Florida.

Oil runs the world. If --

A VOICE: Not for long.

MR. O'TOOLE: There's not one person here that is not dependent upon oil right this moment. Everyone that came here came by the thanks of oil.

A VOICE: I rode my bike.

(Applause.)

JUDGE J. L. BYRNES: Please extend the courtesy to all the speakers.

MR. O'TOOLE: Your bicycle, by the way, was built with oil.

(Applause.)

A VOICE: We do have choices.

MR. O'TOOLE: I can continue on. The Indians need the money. It's their property to do what they own to do. The exploratory well that they're going to drill for is going to protect the Indians, even if it's dry. They have the opportunity to request the oil company bring that well into as a water well for the Indian Reservation. And that cattle out there need water. Even if it's dry, they'll benefit from it. Now, if they hold - if they - if they drill and get oil, now we'll all get money in this state. Lord knows we need it. I said that I own land in the Everglades. I own land in the Everglades National Park. And the one of the few owners that still do. I had the foresight years ago to get my piece of the Everglades so that I can leave it for my children. And I did it.

And I'd like to see oil explored more because we need oil constantly. Oil is it.

Thank you, gentlemen.

JUDGE J. L. BYRNES: Thank you for your testimony.

(Negative crowd reaction.)

JUDGE J. L. BYRNES: The next speaker is Mike Stump.

(Applause.)

MR. M. STUMP: Yeah. My name is Mike Stump. I'm a professor of geology at BCC, a local community college. Address is 3501 Southwest Davie Road, Davie, Florida. I don't know how to, you know, quite follow that last speaker.

A VOICE: Speak up.

MR. STUMP: I've got a number of points here that, you know, kind of go along with what the other folks were saying about the - the separation of production of this well from the wildcat aspect of it. I don't know where that got lost in the time from the environmental assessment a year ago, but at that time you all were addressing the pipeline aspect of it. You were talking about piping oil off of this field or a potential field. And I was under the impression that you were going to address production as well as this well.

And I sent in a whole series of points about or concerns about movements of the oil off of the site. And then, you know, then I got this (indicating) and none of that is addressed there. So I was just wondering where that went.

As far as another area of concern on this impact statement, the alternative locations that were waived out as being non-feasible because - mainly because of wetlands impact, okay, this was the only site to drill. Then - then you take that a step further. And if this - if this becomes a discovery well and you decide to make a field out of it, where do you site other paths for the development of the field? You have no alternative sites in which to put these because you - you - it looks like you've already eliminated them as feasible options here in this impact statement.

I don't know. That's a question that I would like you to be addressing. Also, I don't know where it came from as far as the 7 percent for potential - potential for this to be a productive well. You know, I - I don't know exactly why that was addressed. Was it to maybe show a reason for not dealing with the production of things or, you know, show that, this is obviously going to be a dry well?

I don't think so. I think that, you know, this well has a very good chance of coming in - at least much more potential than 7 percent that they're projecting here. I got some real problems with the way they generated those numbers.

And the basic - basically it kept on coming back to, you know, the removal of the production from this well, the impact of this well. When you start moving the oil around, that's when the real - that's the real weak link in the whole system. And you're going to have to move that across our water supply.

And I think that to save Shell money, to save the Miccosukee Indian Tribe money, this should be dealt with up front; not waited until this well is drilled and then you say, "Well, you can't get the oil off of this site. Because it's going to endanger the environment." Then the Miccosukees are going to lose out. Shell has dumped all this money. It's going to lose out.

Why not address this up front so that we have all the facts that deal with it? And I think the story will speak for itself as far as that aspect of it.

There's some real concerns. It's not just the Everglades that we're moving this across. But we're moving it also across reefs when we take it out of Port Everglades. So, you know, there's all sorts of implications down the line that need to be addressed.

And as far as - as long as that isn't addressed in this, I know what I'm going to be doing personally is I'm going to be boycotting Shell.

(Applause.)

JUDGE J. L. BYRNES: Thank you for your testimony.

The next speaker is Greg Hart.

MR. G. HART: Good evening. My name is Greg Hart. I work with Greenpeace, a local office here in Fort Lauderdale. My address 4141 North Andrews, Fort Lauderdale.

I'm not a lobbyist or a lawyer. You know, I'm not even somebody that works off of a high salary or anything. Most people with Greenpeace don't. But basically what I do is I canvass. That means that I go door to door and I talk to people. I talk to approximately 250 people a week. So I talk to a lot of people. I fund raise. I ask people to write letters on pertinent environmental issues, especially this one. And I get petitions signed.

And I have approximately four hundred petition signatures here that we have received in the last week-and-a-half, two weeks or so. We haven't had a whole heck of a lot of time to prepare for this. I'm sure other group shave their own petitions. They may not be ready to present them just yet.

But, again, like I said, I talk to a lot of people. And even though everyone doesn't give me money and everyone won't take the time to write a letter. Not even everyone will take time from their dinner or from a TV shown to sign a petition. But everyone I talked to in South Florida, Dade, Broward, Palm Beach counties is against this proposed drill.

The citizens of this State, of these counties that it will - that it could affect, do they have any say in this? I mean, they have - they have told us, you know, through the petition signatures that they don't want it.

What bearing does that have on the decision, the final decision you make?

I mean, we pay the taxes. It's clearly demonstrated already that there is a possibility -- I mean, you can't guarantee there won't be a spill. You can't guarantee that it won't contaminate drinking water or the aquifer. So there is a chance.

So shouldn't the concerns and the fears - which are very legitimate -- of the citizens of this state, particularly South Florida around the Everglades region, be taken into consideration?

That's all I have. Thank you.

JUDGE J. L. BYRNES: Thank you for your testimony.

(Applause.)

JUDGE J. L. BYRNES: The next speaker is Karen Koskey.

MS. K. KOSKEY: My name is Karen Koskey. That's K-O-S-K-E-Y. I live at 4112 Southeast 21st Street here in Fort Lauderdale. And I also work for Greenpeace.

I chose to wear black for this hearing because I am in mourning. Mourning for the earth, our mother, whom we were systematically and wantonly murdering. We have denuded 90 percent of her forests, her lungs which give us breath. We have defiled the ocean and rivers, her life blood. And we have raped the land, her essence, which gives us drink and sustenance. We have done all of this in the name of progress and free enterprise.

But is it progress when we can no longer eat the fish from the rivers because of mercury content? Or when we must keep our children out of the sun because of ozone depletion?

The resources of this planet are finite and we are depleting them rapidly. The time to stop depletion is now starting with this proposed drilling.

Are we going to allow Shell to further endanger the Everglades, an already suffering fragile ecosystem for at best a few days' worth of fuel?

Or are we going to take a stand and say "Enough. Stop the Exploitation. Stop the careless squandering of our children's heritage."

Now is the time to explore alternative sources of energy like solar wind and methane.

Do we want to see the Everglades covered in black? Of course Shell sees only green when they look at the glades. The green of money; profits for stockholders. Do they care if the green of the Everglades is covered with the black of their greed?

Yes, the environmental impact report says the effect of drilling will be minimal. After all, Shell paid them half - some half million dollars to do the study. If someone paid you that kind of money, would you tell them the truth or what they want to hear?

Shell says they have a contingency plan if anything happens, like a spill. Well, Exxon told the people of Alaska they had a contingency plan also. That one worked out real well; didn't it? (Applause.)

Things will never be the same in Valdez. The fishermen are still suffering. Wildlife is still dying. The economy is in shambles.

Florida's economy depends heavily on tourism and the Everglades are one of the premier attractions. Shell will only be here for a little while, but they could destroy Florida's economy for a long, long time if not forever.

Don't let this happen. Just say no to drilling and just say yes to the Everglades.

Thank you.

(Applause.)

JUDGE J. L. BYRNES: Thank you for your testimony.

The next speaker is Holly Ostergaard.

MS. H. OSTERGAARD: Good evening. My name is Holly Ostergaard. O-S-T-E-R-G-A-A-R-D. I also work with Greenpeace. My address is 1620 Northeast 20th Avenue in Fort Lauderdale. The loss of the Everglades would actually have a positive effect on my future. Okay. As an environment activist, my goal is to help the public recognize how what is going on around them is affecting our environment.

The loss of the Everglades, with the accompanying loss of jobs, tourism and the risks endangering the lives of already-endangered species, would certainly make the public take notice that I am working for every day.

I stopped by a Shell station on the way over here today. On Andrews Avenue. I spoke to the independent owner of that Shell station about how he felt about Shell drilling for oil into the Everglades. His comment to me was Shell should stay the hell out of the Everglades.

A VOICE: Yeah.

(Applause.)

MS. H. OSTERGAARD: We're all relatively familiar with this substance (indicating); right? Oil. Our cars don't go without it.

Pretty. Kind of brown. Make our cars go. It, however, does not make the world go around. Money may. Which is why I fund raise for Greenpeace and why I work to make this planet safer and better for all of the people who live on it regardless of gender, race or tribe.

I cannot allow the destruction of ecosystems to be my game. I must work to prevent more damage from being done to our environment.

Mr. Abbey, is listening to everyone's concerns enough? If we allow this travesty to happen, which one of you is going to stand up and say, "But I listened to everyone's concerns and I thought it would probably be okay." When our water is contaminated and the Everglades stop attracting the millions of tourists because it is incapable of supporting life.

Are you willing to risk the glades just to find out that there isn't any oil? How long will it last us? And are we that desperate?

We are choosing to ignore viable energy alternatives and continuing to risk our natural surroundings to please industry.

Have we reached the point of desperation when five-days' worth of oil is worth risking Florida's economy?

If we are, how come we don't know about it?

If all of us here together, for the five days' worth of oil that's there, promise to take cold showers and not watch TV for a whole week, can we keep our Everglades?

A VOICE: Yeah.

(Applause.)

MS. H. OSTERGAARD: Save our energy and save our Everglades.

(Applause.)

JUDGE J. L. BYRNES: Thank you for your testimony.

MS. H. OSTERGAARD: Just so you don't forget what this is all about.

JUDGE J. L. BYRNES: I'll try not to confuse this with the water.

(Laughter.)

A VOICE: They don't mix. They don't mix.

JUDGE J. L. BYRNES: The next speaker is Susan Eden.

MS. S. EDEN: My name is Susan Eden. My address is 8881 Southwest 49th Court, Cooper City, 33328. I'm here tonight representing not only myself, but my husband and our four children who all are native South Floridians.

The EIS done on this site is flawed in many ways including using outdated material. One is the EIS states on Page 3-44 that, quote: "The Biscayne aquifer is absent from the project site," unquote.

Two. Figure 3-8 uses an outdated 1978 U.S.G.S. map.

Three. Appendix A-6 on Page 16 speaks of the Biscayne aquifer being five to ten miles east of the project.

Four. Appendix 8 A-9 speaks of wildlife, but fails to address the adverse effects to wildlife in the area as well as Federal and State-owned lands that are parks and natural preserve areas.

Facts are that the U.S.G.S. has updated information and maps - U.S.G.S. shows the Biscayne Aquifer is in this area. Also, EPA did a study in - on South Florida, which includes the map showing the Biscayne aquifer completely covering Broward County.

This is dated in February of 1992. This was done to protect the Everglades and protect South Florida.

The Biscayne Aquifer underlies all of Broward County. As stated by U.S.G.S. and U.S. EPA, it is the sole drinking water source for more than four million people in South Florida and has been designated by U.S. EPA as the sole source aquifer under the Safe Drinking Water Act of 1974.

Ninety percent of Floridians depend on groundwater for sole drinking water source.

I also object to any proposal to drill at a slant underneath or near the conservation area. This conservation area is owned by the people of Broward County and State of Florida, not by the Miccosukee Indian Tribe.

I would respectfully request that this proposal be denied. And also, if you haven't seen this, the maps are very detailed. It does show the Biscayne completely surrounding Broward County going up into Palm Beach, going over into Collier, Hendry, Glades.

I don't think this EIS study was very complete. I think it was very selectively done.

Thank you.

(Applause.)

JUDGE J. L. BYRNES: Thank you for your testimony.

The next speaker is Bruce Omby.

MR. B. OMBY: Thank you. My name is Bruce Omby. I reside at 717 Southwest 12th Avenue in the City of Fort Lauderdale, 33312.

I'm here tonight in two capacities. One as a private citizen. And the second is as the Chair of the Natural Resources Protection Advisory Committee for Broward County which on Monday night voted its unanimous support of Broward County Commission's resolution to oppose the proposal of the exploratory drilling well, and will put the full resources of the County against this.

(Applause.)

Speaking as a private citizen, I have some real problems in reviewing the EIS. There's been a number already pointed out, most notable is the No Action alternative which should have been supported a lot more fully than it was.

I think one facet that was not touched on by many of the other speakers, even though I agree with most of what the others had to say, is the socioeconomic impact analysis. One of the things that needs to be factored into all of these calculations, if you have a test well and it works out, then you develop a drilling field, is what will happen to the communities surrounding that field and the impacts on them from schools, roadway capacity, and getting trade workers in and out of those areas.

South Florida has been buffeted by tremendous growth over the past two decades and is just now beginning to get some semblance of a handle on these issues. And to throw something like this into it would just further throw it into disarray. Thank you for your time this evening, gentlemen.

JUDGE J. L. BYRNES:

Thank you for your testimony.

(Applause.)

JUDGE J. L. BYRNES: The next speaker is Julia Jones.

Julia Jones. Going once. Going twice.

A VOICE: Here she comes.

MS. J. JONES: Good evening. My name is Julia Sue Jones. I live 1014 West Las Olas in Fort Lauderdale, 33312. I'm a 72-year resident of Fort Lauderdale.

I don't claim to be an expert on oil drilling. I know nothing about it. But there's one thing I do know and every person in this room also knows it. This is going to be done by people, and people are not infallible. There will be mistakes. There will be accidents.

(Applause.)

MS. J. JONES: Just as sure as I'm sitting here there will be accidents. And as long as we have that possibility, we have no right to take a chance on destroying the Everglades.

Thank you.

(Applause.)

JUDGE J. L. BYRNES: Next speaker is David Hartman. Hartsman.

David Hartsman. Could be Hauptman. No Mr. Hauptman? Hartsman?

Tell you what, we'll come back then. Mr. Tim Murphy.

MR. T. MURPHY: Good evening. Appreciate the opportunity to speak before you this evening. My name is Tim Murphy. I'm Deputy Director of the South Florida Regional Planning Council. Offices located at 3440 Hollywood Boulevard in Hollywood.

Having obtained a copy of the draft statement just last week, the council staff has not had adequate opportunity to conduct a thorough analysis of the proposal. However, I would like to indicate that a general concern exists at this time regarding the exploration phase and that this concern is significantly heightened with the prospect of future extraction of oil and gas products in this location in the region.

This proposal has every appearance to run counter to many of the efforts which the Council has stood for over the years. Policies contained within the Regional Plan for South Florida which serve to illustrate the general concern include the following:

Policy 81-19 which deals with coordinating management and land use planning efforts specialized specifically at enhancing the region's water resources.

Policy 81-22 dealing with state, regional and local -- Excuse me -- local government entities protecting the water -- Can't read my own writing -- water supply affecting Everglades National Park, State park lands and other environmentally significant areas.

Policy 10.2.4, which requires consideration of various plans, including Save Our Everglades, East Everglades Resource Planning and Management Committee, implementation of several swim plans. Also, Policy 14.1.9 which excludes resource extraction activities from environmentally sensitive areas.

Staff will be conducting a detailed review of the draft environmental impact statement over the next few - next several days.

We'll also seek an action of the Council Board prior to submitting a more comprehensive response and will be providing some written comments to you from the Council itself.

Appreciate the opportunity.

(Applause.)

JUDGE J. L. BYRNES: Thank you for your testimony.

Next speaker is Jim Fisher.

MR. J. FISHER: James Fisher. 1912 Trafalgar Drive, Sevem, Maryland. I'm here on Spring Break, and I felt that this was pretty much important enough to take a night out of my time to come up here and to tell you folks that I oppose this for the obvious reasons. We're talking about a big environmental --

(Applause.)

We're talking about a pretty big environmental issue here. Florida Everglades are -- I know people have said it before -- are the only ones in the world. They're also an important water supply here in South Florida, and we need to keep it that way. We need to protect them.

Earlier you had said you wanted to get through this as quickly as possible and didn't want to stay here too long, but as you can see with the opposition we're ready to stay all night just so show we believe in it.

JUDGE J. L. BYRNES: So are we.

MR. J. FISHER: We're ready to fight. Okay?

Thanks.

(Applause.)

JUDGE J. L. BYRNES: The next speaker is Carrie Ving.

MS. C. VING: Hi. My name is Carrie Ving. And I don't - I'm not representing anyone except for myself as a citizen of Florida. I live at 3613 Loquat Avenue in Miami.

And I mainly want make one point. And that's although you have a very pretty packet that you put together as far as the test exploration, I think the main point and the main concern is the fact that where is this going to be leading to? We're moving ahead on the question of - if the test site doesn't prove to have any oil there, we'll just want to move somewhere else in the Everglades and find more oil. Or if obviously the test proves to be - if there's oil in the Everglades, that means that there's more grounds towards more oil wells and so forth.

Overall, my point is the fact that if we lower our standards to allow oil drilling in the Everglades or oil testing in the Everglades, that just makes it a lot easier to stoop lower the next time.

That's it.

JUDGE J. L. BYRNES: Thank you for your testimony.

(Applause.)

JUDGE J. L. BYRNES: The next speaker is Tom Weiss.

MR. T. WEISS: I feel like I'm at a Senate Confirmation Hearing.

My name is Tom Weiss. And my address is 1320 South Dixie Highway, Suite 1140, Miami. 33146. And that's my office.

I'm here today representing Clean Water Action, an environmental organization with over 50,000 members in South Florida.

We are of the opinion that this document (indicating) is grossly inadequate. It doesn't use best available data. And it's got holes in it big enough to drive a truck through.

From reading through this document I get the impression that the authors don't understand what EIS's are supposed to be for. They're supposed to be to determine whether or not the Federal action is going to harm the public welfare.

We are of the opinion that this Federal action, if it went through, would. And we don't see that reflected in this document.

The alternatives analysis in the EIS focuses on where to build a road. I know you've heard this earlier tonight, but I want to repeat it.

The alternative analyses focus on where to build a road. The alternative analysis ignores the most obvious alternative. Gives it very short shrift. I won't say it ignores it. It but all but ignores it. And that is drilling for oil somewhere besides the Everglades.

(Applause.)

Or how about not drilling for oil period?

(Applause.)

The report also misses a key point, we feel. And let's be honest. If oil is eventually found and drilling is allowed, what kind of impact is this going to have on the Everglades? This project will do little more than to grease the tracks for further oil development in the Everglades. And we don't want that.

We feel that this document needs to be scrapped and rewritten. The document virtually ignores cumulative impacts on the environment, as you've heard tonight. Especially when you consider the fragile state of the Everglades.

This EIS gives the impression that the Everglades is just like any other place, not one of the most endangered ecosystems in the world, which, let's be honest, that's what we're dealing with here. This environmental impact statement totally ignores the fact that the State of Florida is planning a massive redesign of South Florida's water delivery system. The water delivery system that's going to be redesigned to help restore the Everglades and Florida Bay.

I have a question that I'd like to ask. If we could take thirty seconds, maybe I could get an answer.

Do you have any idea what the new water flows are going to be? What they're going to look like in South Florida once this water delivery system project goes through?

MR. ABBEY: I don't.

MR. T. WEISS: Okay. Have you consulted with South Florida Water Management District on this topic?

JUDGE J. L. BYRNES: Mr. Weiss, this is not the forum to --

MR. T. WEISS: Okay I'm not trying to be confrontational.

JUDGE J. L. BYRNES: No. I understand. But the agency is trying to get your input --

MR. T. WEISS: Okay.

A VOICE: He can ask a question.

JUDGE J. L. BYRNES: -- and actually determine whether the environmental impact statement is deficient. Representatives from BLM will be here and they'll be happy to talk - talk with you about it.

MR. T. WEISS: Okay. Let me just state the points. Then I'll stop asking questions.

I think it's important that you consult, before you come up with a final EIS, that you consult with the South Florida Water Management District as to what this new redesigned water delivery system is going to look like, how it's going to look like when it possibly comes through this area where you propose to drill for oil. Okay? And that you also consult with the Army Corps of Engineers. If I could just make that suggestion.

And we're of the opinion that this environmental impact statement is not and cannot be complete until that analysis has been done. It just seems common sense and it seems to be a fatal flaw.

And one other point is that a Interior Secretary Babbitt has called the Everglades, quote, "a test case for the entire nation." He says that what happens here will set the precedent for the entire country. And he has singled out the Everglades, our Everglades, as the Clinton Administration's number one priority for developing an ecosystem approach to protecting the environment.

Now, with all due respect to you, Mr. Abbey, we feel that this decision is so important that it should be made at the very top as this decision will affect all Americans, not just South Floridians. We need a clear signal from the Clinton Administration on whether or not this project should go forward. And we think it should not.

Please let it reflect in the record that the Clean Water Action requests that this decision involve the highest levels of the Department of the Interior.

Thank you for your time.

(Applause.)

JUDGE J. L. BYRNES: Thank you for your testimony.

The next speaker is Diane Petitjean.

MS. PETITJEAN: My name is Diane Petitjean. I am an officer with the Environmental Coalition of Broward County. Our address is 1061 West Oakland Park Boulevard in Fort Lauderdale, 33311.

The Coalition will be making a more complete written comment before May 18th, but this evening I would like to make two points.

The first is the impact statement concludes that normal operations of the drilling site will not have a significant effect on wildlife. And I will not argue about this arguable conclusion. However, the statement fails totally to address the impact of man-made or natural catastrophes on wildlife.

And I guess to be correct I ought to say person-made.

The EIS does make the claim that the risk of such catastrophes occurring is small. But even if this is true, this does not relieve you of the responsibility to assess the consequences of this small risk if it becomes a reality. And most of the deficiencies of the impact statement in this regard are omissions. However, I do have two examples that are in appendix A-10 on Pages 28 and 29 that illustrate the failure of the impact statement to address the consequences of catastrophic events.

One statement: "Knowledge of methods to clean contaminated water fowl is limited as is actual cleaning experience." I don't find this very reassuring.

Another statement: "In the case of a major spill, it may be desirable to utilize an independent marine research company to determine the effect of a spill on aquatic flora and fauna."

I would suggest that we ought to utilize an independent marine research company before the spill occurs.

Needless to say, since the statement does not fully address the consequences of catastrophic - of one catastrophic event, it certainly does not address the possible consequences of more than one catastrophic event.

My second point is that to be complete the environmental impact statement must address the impact of all the environmental consequences of allowing exploratory drilling at this site. And one consequence that you cannot ignore is the virtually automatic permitting of other exploratory drilling sites and productive drilling at this site and other similar sites if significant reserves of oil are found.

Drilling at this site would set a legal precedent and denial of permits for future drilling sites could reasonably be considered arbitrary and capricious on the part of the regulatory agencies unless you are able to prove that the facts of the situation have changed.

I suggest that you recognize the facts of the situation now.

And I wanted to illustrate what I see as the consequences of ignoring the impacts -- all of the impacts of this site. This is the site we're talking about. If you allow this site, you have virtually automatic permitting of other sites. I'll try not to put anything in a conservation area.

(Laughter.)

And if you can't see what is shaping up here, I'll draw it for you. If I had the microphone -- I better put it down; go over to the easel.

The site we're talking about this evening is the first nail in the coffin. And this (indicating) is the shape of things to come if we approve this environment impact statement.

(Applause.)

JUDGE J. L. BYRNES: Thank you for your testimony.

The next speaker is Ruth Clark.

MS. R. CLARK: I'm Ruth H. Clark, 1120 Seminole Drive, Fort Lauderdale.

I've been studying water issues in Broward County for the last ten years and have been attending many of the South Florida Water Management Lower East Coast Water Supply studies and programs. I implore this administration not to continue a drilling policy whose cumulative impacts are bound to destroy the World Heritage Everglades and its already depleted ecosystem.

Since this impact statement was started the Army Corps of Engineers and the South Florida Water Management District have been trying to arrive at regulatory water levels that will protect the various estuaries and presumably will provide enough fresh nutrient-reduced water to Everglades National Park and Florida Bay.

When and if the new regulatory run goes into effect in May, 1994, conditions in the water conservation areas and the canals maybe very different than they have been. Structural changes may be required.

Now, this impact statement uses old maps, as other people pointed out. And 1972 water flow information, which is really obsolete.

The impact statement does not reassure me that drill fluids and drill cuttings are being handled in the manner to guarantee environment protection since Federal and State underground injection control regulations do not apply to subsurface and placement of fluids during construction of oil and gas wells, and the lobbying power of the oil industry has obtained an exemption from its definition of hazardous waste for drill fluids under the Resource Conservation and Recovery Act of 1976.

The parameters of all the aquifers are not yet well enough defined to be sure that horizontal connections or vertical connections could not be found since drainage is all to the east or southeast from the well site above and below ground, a risk is involved. The drill site is inundated 55 days of the year. The Federal Emergency Management Agency has rated Western Broward a D-zone, which is defined as an area of undetermined but possible flood hazards.

Water conservation area 3-A is inundated 135 days per year now.

The 325-day time schedule does not all fit into the dry season.

A tornado caused one of the oil and brine spills that the impact statement reports. Of the 97 reported spills, nothing is said about the assessment being made of the effects - of any effects on habitat or wildlife. Local monitoring must not exist for 27 spills to be classified as causes - "causes unknown." Twenty-seven spills were caused by human error. This is much too risky for the Everglades.

It is bad enough that the South Florida Water Management's S-140 pumping station next to the well site has had a 15,000-gallon diesel fuel spill. It's bad enough that to save Alligator Alley - to save lives, Alligator Alley had to be turned into I-75 where last week a tanker truck driver fell asleep and dumped a tanker of gasoline into the borrow canal.

These -- I have a clipping here that shows that the Everglades oil -- This goes back to 1988. But it talks about two tanker trucks having overturned resulting in oil spills. And it talks about the pipeline at the time leaking and causing contamination in the swamp.

These things are not what we can tolerate. I think the No Action alternative should be followed at least until Federal water quality standards are met throughout the water conservation areas, Everglades National Park and Florida Bay. The world only has one Everglades.

Thank you.

JUDGE J. L. BYRNES: Thank you for your testimony.

(Applause.)

JUDGE J. L. BYRNES: The next speaker is Julie Doherty. Julie Doherty.

MS. J. DOHERTY: Hello. My name is Julie Doherty. Executive Director, Environmental Coalition of Broward County.

Please do not allow our Everglades ecosystem to be Shelled. This is a statement I make because looking at the applicant's SWEPI study definitely tends to cause an outbreak of red flags and quite possibly even a black flag if you should allow precedent to be set through this ill-thought-out plan.

Within this economic-driven study Shell has tried to bombard this agency with its very own facts. The applicant itself has cut and sewn the cloth of reality to suit its own purposes and needs. This agency must ask the applicant and demand an answer to many questions.

Why was the best available data not used? This agency must ask of itself. Should this agency be content with a 1978 map that is being used?

Is this agency being taken in an oily manner through surface water velocity figures based on the 1972 average?

Why is the Everglades restoration area glossed over?

If the force of your accord leaks, are the created problems irreversible?

Is it a right that the environmental impact study does not have to address the cumulative impacts of all such permits as may be issued for this action?

Why is there such a glaring and quite noticeable failure in that the study does not analyze the cumulative impacts of oil drilling.

Why is the execution of some of the notions of this study based on a campaign of acceptance of assumption rather than true fact?

Shouldn't the particulars of an individual situation carry bearing on a case-by-case basis instead of data discharged elsewhere?

There, of course, many other questions and concerns. But, naturally, there would be.

We already know the feeling of Shell Oil towards our valued Everglades ecosystem as I believe can quite aptly be demonstrated even on a low level. If you turn to Appendix A-10, Page 28, letter capital E of your SWEPI study, you will note that under "water fowl" cleanup, water fowl is spelled W-A-T-E-R F-O-U-L. Shell Oil should know.

In closing --

(Applause.)

In closing, I and many others would like to see the application denied. But if this is not your interest, please ask the applicant to provide you with a supplement that will specifically address those topics the applicant has failed to address. And, also, to use the best available data instead of outdated data that tend to mislead.

Thank you very much.

(Applause.)

JUDGE J. L. BYRNES: Thank you for your testimony.

The next speaker is Steven Ebanks.

MR. S. EBANKS: Okay. I'm a Florida wildlife sportsman and many of my friends are Florida wildlife sportsmen. In the Everglades we harvest deer, wild hog, ducks, freshwater fish, etcetera. My two old sons and I enjoy hunting and fishing so much that I purchased a lifetime license.

I work for the City of Fort Lauderdale's Utility Department in one of its -in its only waste water treatment plant. And experience has taught me this: Safety rules are good and precautionary measures are good to prevent harm to the natural environment. They're produced with good intentions.

But let me remind you of the worst-case scenarios that commonly occur. But first notice what is stated on Page S-8, Section 43, Geology and Soils.

Okay. "No significant impacts on the geological environments are expected."

Now, back to the worst-case scenarios.

Human error. Look how often we hear about it through the media and how sad is the extent of damage that is often occurred.

Second, sabotage. Many times all it takes is a dispute between an employer and an employee and who pay for the person's angry rage? The animals and the plant life.

Third, natural disasters. As mentioned earlier by one of the speakers and then the sad excuse. Citizens, you have to agree that the situation with the storm was just one that was beyond our control. Now, in opening, one of you gentlemen read off that the desired test drilling would cause no harm to the ecology other than temporary disturbances. The three points that I just discussed reveal the emptiness of the statement. Here's an analogy. My wife once asked a life insurance salesman that was attempting to sell us a plan that would build up equity what would happen to our money if this company went bankrupt? He had to admit that we'd be on the losing end.

(Applause.)

JUDGE J. L. BYRNES: Thank you for your testimony, Mr. Ebanks.

The next speaker is Thomas D. Martin. Mr. Martin? Okay. We'll come back to Mr. Martin. John Oliver.

MR. J. OLIVER: Good evening. My name is John Oliver. I'm born and raised in Florida. I live in North Miami Beach presently.

Now, One of you mentioned earlier that you had considerable feedback already before this hearing tonight concerning this issue. And I'd like to know from that feedback what percentage is in favor of drilling and what percentage is against drilling?

MR. ABBEY: I can't give you that figure.

MR. J. OLIVER: Why can't you give it to me? If you had so much feedback, don't you have some kind of statistical count?

MR. ABBEY: The majority of the people are against it.

MR. J. OLIVER: Okay. Thank you. Also, as representatives from the Federal Government I was wondering: Were you put into your position in the former Republican Administration? Or were you put into these positions by the Democrats?

JUDGE J. L. BYRNES: Sir, as I said, this is not an adversarial proceeding. Mr. Abbey is not here --

MR. J. OLIVER: I'm not attempting to be adversarial --

JUDGE J. L. BYRNES: -- under cross-examination. He is a career civil servant. I can tell you that.

MR. J. OLIVER: Okay. The reason I ask is after having read Vice President Al Gore's book on the environment, I find it rather ironic that the Federal Government would do anything to encourage drilling in the Everglades.

And I also consider it, to speak rather bluntly, a complete betrayal of the public trust to think that you would actually seriously consider doing such a thing.

There's been a lot of complaints about the EIS being poorly prepared, but I managed to find an item of profound truth in the report. And that's on Table 4-2. Do you have the table before you?

JUDGE J. L. BYRNES:

(Shakes head, indicating negative response.)

MR. J. OLIVER: And the summary.

MR. ABBEY: I know the one you're talking about.

MR. J. OLIVER: Basically along the top you have exploratory drilling and then along the left column is water resources. Basically showing the impact that exploratory drilling would have on water resources. And basically it says that accidental contaminant release could affect water quality. Now, I'd like to you elaborate, if you could, to what extent would it be contaminated?

MR. ABBEY: I'll be happy to answer your questions after the hearing is over with.

MR. J. OLIVER: Why don't you do it now?

MR. ABBEY: Because I'm not.

JUDGE J. L. BYRNES: Sir, as I said, the purpose of hearing on the record is to get the views of the people here today.

MR. J. OLIVER: This is part of my view.

JUDGE J. L. BYRNES: That's fine.

MR. J. OLIVER: Is to ask the question to try to find out the information.

JUDGE J. L. BYRNES: You're more than welcome to stay here. You're more than welcome to state your views.

MR. J. OLIVER: Listen, I have a right to ask a question and expect an intelligent answer. This is ridiculous.

JUDGE J. L. BYRNES: Sir --

A VOICE: It is ridiculous.

JUDGE J. L. BYRNES: -- the people from BLM will be here after the hearing.

MR. J. OLIVER: Well, why don't they just answer it now?

JUDGE J. L. BYRNES: They had an open house today. They had an open house today. Which I told you before. Now we are trying to get --

A VOICE: Well, we were working today.

JUDGE J. L. BYRNES: If you don't wish to express your views, there are a lot of other people here that do. And I'd like to get through to give everyone the opportunity --

MR. J. OLIVER: All right. I will do that.

JUDGE J. L. BYRNES: -- to do that.

MR. J. OLIVER: All right. I will express my views. First of all, I won't be using Shell gasoline any more.

(Applause.)

Secondly, I'd like to go ahead and appoint a committee from the Federal Government to examine the situation more closely. And, well, basically it will be a combination of the Federal Government and the people in this room. And as the chairman of the committee I'd like to name our Vice President Al Gore. And as members of the committee we will all get in touch with Mr. Al Gore either through letters or through the telephone, speak to his representatives, and get the point across to him that we're very disappointed that an administration in which he's the Vice President would seriously consider drilling in the Everglades. Especially after having his read his book, you know, which is so strongly supportive of the environmental movement.

Basically, it seems that the Federal Government still hasn't learned how Floridians feel about oil drilling. You should have learned a long time ago from the offshore oil drilling resistance.

I can guarantee you that if Floridians will become very enraged about this particular issue and we will not allow to you drill in the Everglades.

Thank you.

JUDGE J. L. BYRNES: Thank you for your testimony.

The next speaker is Paul Barnes.

A VOICE: Who?

JUDGE J. L. BYRNES: Mr. Barnes. Paul Barnes.

No Mr. Barnes. We'll come back to him.

The next speaker is Lori -- Is it Sheene?

MS. L. SHIVER: (Standing) It's Laurie Shiver. I'm a resident of the Fort Lauderdale. I was born in Florida. I came here to talk logically.

JUDGE J. L. BYRNES: Excuse me. Could you spell --

MS. L. SHIVER: I don't care to sit at your table. I'm Laurie, L-A-U-R-I-E, S-H-I-V-E-R. You have it from last year. Address is the same.

JUDGE J. L. BYRNES: Thank you.

MS. L. SHIVER: I did have something to say, a logical conclusion to reach, which we discussed last year, like a lot of these good people did. But, you know, this is just another bogus hearing. The only reason all these good people showed up is so the press doesn't report that none of us care, that no one showed.

Now, obviously, you're going to go ahead with your plan like you said in here. We gave you a year to reach the logical conclusions. You did not.

All that means anything in this report is potential risk. Like the potential risk that was in Alaska, that was off the coast of the Spain, that was in the Mississippi River last week.

Now all you understand is money. All that Shell understands is money. So you report back to Shell Oil that from now on these good people, all their friends, will be showing up at Shell oil stations in Florida with signs that say that panthers and oil don't mix, and that the Florida Everglades is not to be treated like this.

How do you think their customers are going to feel when we tell them that Shell is destroying the Everglades? That's where it counts for Shell. That's what we're going to do. You can count on it.

(Applause.)

JUDGE J. L. BYRNES: Thank you for your testimony.

The next speaker is Rosalyn Sherry.

MS. R. SHERF: My name is Rosalyn Sherf. I live at 1060 Tyler Street, Hollywood, Florida. I'm here as a private citizen. I do belong to several groups. I'd also like to think I'm here speaking on behalf of the animals that can't speak.

And I'm also here, I guess, representing over 500 people who signed an Earth First Boycott Shell petition that well submit to you. Many of these people wrote their comments which are very important.

In regards to your EIS statement there are several things I question. One is you seldom mention - they seldom mention in the EIS the Everglades ecosystem. They call it the "project site" or the "study area." This is a World Biosphere Reserve. It is probably not the only one in this world, but the only one in the universe.

The oil that we have gotten in the past from Florida through 48 years of oil drilling could be produced by OPEC within four-and-a-half days. So the amount of oil in the past that's been gotten out of Florida has been very minimal. There is also problems since 1972 in which a 163 gallons of crude oil have been spilled in Florida and a 120,000 gallons of plant-killing brine.

More than 81 spills have occurred in South Florida. In 1989 in Collier City there was a 21,000 gallon oil leak soaking sandy soil four-feet deep. There is no reason to believe that this would not happen again had it - had Shell be drilling in the Everglades.

Last year when we were at the hearing we brought up - one of the things we brought up was: What will they do in the case of a hurricane?

What they have written in the EIS is insufficient when you compare it to what happened when Andrew came. If we get another Andrew, their plans will not hold up. And, again, they'll be problems with oil in the Everglades.

There have also been 33 leaks along two miles of a 20-year old pipeline that goes through the Big Cypress National Reserve. Most of this has been in a foot or more of water. You not only have the oil, but you have the brine, the drilling fluids, the hydrogen sulfide gas, which is also used when drilling for oil.

One gallon of petroleum could taint one million gallons of drinking water. And, as you see, oil and water do not mix.

In regards to the wildlife there is really no good clean-up plan when you look at the EIS statement. They stated that they have accompany in Atlanta that they will notify should a spill occur, and that they are depending on Federal and State agencies to clean up. That people from the Clean Gulf Association from Louisiana will come and help clean up our wildlife.

They have not talked to the people down here that have been in charge of cleaning up wildlife. I know one center who has been certified and trained said they could not handle an oil spill in the Everglades with the magnitude of wildlife that would be endangered.

The other thing we've learned through the Gulf War is many of the birds see this shiny sheen thinking it's water and they land on it. And then they're stuck in oil. And then thousands of birds die.

We have lost 95 percent of our wading bird population in Florida. We could lose the last five percent in a bad oil spill.

The EIS also talks about doing a pre-damage survey, but they didn't say which -whether citizens, the government or Shell was going to pay for these surveys.

The other important thing that they have not noted and someone is here who is going to speak on this who is much more expertise than I am, but this is a map of the panther habitat that is shown in the EIS statement. One thing that is on the map, this is where the drill site is, this is right where panthers migrate between these two areas. You're going right through the panthers' habitat area.

The other big problem with this map, is this is the map from the Florida Panther Habitat Protection Plan which shows the telemetry of the panther. There are many more areas covered by panthers on this map than the one shown in the EIS statement. So this map is sold and outdated.

I have been told by government officials that we have spent 73 million dollars on preserving the panther. I cannot believe that will we would now waste all of that money by endangering the panther even further with the oil drilling, with the people, with the roads and with the machinery.

In your - in the EIS statement on Page 4-55 it says, quote, "The increase inactivity may discourage use of the area by young males, but this area is not routinely utilized by panthers."

That is a mistake. It is utilized by panthers.

The other thing, we shouldn't even have this meeting. There should be no - no question that we should not be drilling in the Everglades.

(Applause.)

Because it is our one and only Everglades.

And last, but not least, I, too, was in the room when Secretary Babbitt made the promise and made all the comments about the Everglades. I heard him with my own ears say what he said. And I urge everyone to call him at his office, area code 202, 208-7351.

Thank you.

JUDGE J. L. BYRNES: Thank you for your testimony.

MS. R. SHERF: Signatures.

JUDGE J. L. BYRNES: The next speaker is Brian Sherf.

MR. B. SHERF: My name is Brian Sherf. And I'm at the same address as my wife, of course. Every time I come to one of these hearings and the citizens are called on to rescue the environment from some hair brain scheme, I think back to the statement that Ansel Adams made. He was the great landscape photographer who took many beautiful photographs of Yosemite. And he said, "It's horrifying that we have to fight our own government in order to save the environment." The draft --

(Applause.)

The draft EIS misses the whole point. To rephrase the Clinton campaign slogan, "It's the ecosystem, stupid." Or more precisely, "The Everglades, stupid."

The issue here is not technology, but the integrity and survival of one of the most threatened ecosystems on earth. The draft EIS is totally inadequate because it fails to describe and analyze the cumulative effect -- impacts that have resulted in the relentless piece-by-piece destruction of the Everglades during the last hundred years.

To illustrate the concept of the cumulative impacts imagine the Everglades ecosystem as large, delicately woven tapestry. Each negative impact suffered by the impact over the years can be symbolized by the removal of a thread or threads depending on the scale of the impact or action.

Each agency has in the past claimed that its proposed action will only remove one thread and will not have noticeable effects upon the tapestry. But it is the combined effect of all these individual actions that results in the insidious loss of so many threads that over time the tapestry, like the Everglades, becomes thread bare.

Ecosystems such as the Everglades are not destroyed in one great cataclysm; they are destroyed incrementally, one piece at a time, slowly over decades or centuries. Changes to the ecosystem often come so slowly that only the most careful observer would notice them until it was too late. A good example of this is the recent ecological collapse of Florida Bay.

In order to restore the Everglades we have to get to the root of the problem, which is faulty, piecemeal, decision-making process used by government agencies. According to Lance Olson (phonetic) agencies that divides the decision-making process that chips away the ecosystems little by little. This faulty process sets up ecosystems for further incremental destruction. Agencies argue that their single proposed action by itself cannot significantly jeopardize an entire ecosystem.

The BLM and related agencies typically ignore the rest of AN ecosystem and the detrimental cumulative effects that have occurred over the decades. This systematic process allows agencies to get their pet projects rubber-stamped while circumventing the responsibilities to maintain ecosystem health and integrity. Agencies treat each such action as if it was the only development in a pristine environment. When a Federal agency proposes any single action, it must be evaluated in context with all the other cumulative effects of all past, present and proposed actions in the same ecosystem.

Page S-5 and I-5 state: The EIS includes analysis of a direct, indirect and cumulative impacts of proposed action and alternatives.

Page 4-60 describes the area of the proposed action, and I quote, "the Everglades ecosystem," unquote.

Therefore, the affected environment is the Everglades ecosystem. But, incredibly, Section 3.0: The affected environment does not adequately describe how the Everglades ecosystem functions nor the cumulative impacts such as drainage, urbanization, agricultural development and other aspects including the ever-expanding highway network like I-75 that have caused the Everglades' incremental destruction. Consequently, throughout the document description and analysis is limited largely to this one five-acre site. By utilizing the strategy of defining an area as narrowly as possible, agencies greatly increase the odds of a no-significant-impact finding.

The document states on Page 4-60, cumulative impacts are impacts likely to occur during the proposed action or alternatives. And here is the key word. The key phrase I might add. "In combination" with other past, present and reasonably foreseeable future actions. The draft evades this requirement completely.

There is no cumulative analysis of oil drilling in the Everglades ecosystem. On Page 4-60, in Appendix I, Page 9, a total of about one page describes the impacts of oil drilling. No cumulative analysis given.

This is really sloppy work. Oil exploration has considerable cumulative effects. Briefly, at each target area. There is, number one, exploration impacts, laying seismic lines, destruction of vegetation by survey vehicles, human encroachment, etcetera. Even if no well is even drilled.

Number two, there's development impacts. Fill material, alteration of surface water flow, laying pipelines, elimination of more vegetation, construction of tank batteries, separation equipment, access roads, continuous noise and human presence.

Number three, production impacts. Maintenance and human activity. Throughout the whole life spell of the well which could last 20 to 30 years. We'll have more disturbance of wildlife and the possibility of spills.

And, lastly, number four, as recovery impacts more people and equipment are brought to the site to remove production equipment.

Exploration roads then often remain as ORV trails resulting in continued human encroachment and environmental damage of the ecosystem. The cumulative impacts are likely to be significant when hundreds of other past, present and likely future wells are factored in and have been drilled in the Everglades ecosystem since the early 1940s.

If Dames & Moore had done their job and had a map of the cumulative impacts that showed the sites of each production well and each dry well and where the seismic lines have been laid and where the exploration roads were, this map would like a piece of swiss cheese interlaced with spaghetti.

The draft also fails to disclose the oil spill record in South Florida, and an informed decision cannot be made, the probability of a spill cannot be realistically analyzed.

Directional drilling is advocated in the proposed action increases the risk of a spill. Over the last 20 years over 81 spillshave been recorded. 163,000 gallons of oil and 120,000 gallons of brine. And then we really have a time bomb ticking out here: Conservation Area 3. We have this 20-year old Sunniland pipeline which runs across this area. Thirty-three leaks were found. Most likely the proposed action would utilize this pipeline at one time or another if oil was found. The draft paints a misleading picture as to the probability of a spill.

In summary, because of the fundamental failure of the draft to analyze the cumulative impacts upon the Everglades and likelihood of these impacts being severe, the application for permit to drill should be denied.

And, again, for the audience, the people that love the Everglades, if you didn't get that phone number for the Secretary of Interior, Bruce Babbitt, it's area code 202, phone number 208-7351. And tell him you don't want oil drilling in the Everglades.

Thank you.

(Applause.)

JUDGE J. L. BYRNES: Thank you for your testimony.

The next speaker is Kat Dees, who may or may not be related to Katherine Dees.

A VOICE: She's coming.

MS. K. DEES: Not used to props. My name is Katherine Dees. I'm the Executive Director of Save the Florida Panther. And I'm here today to ask that this permit be denied.

Primarily because we, at Save the Florida Panther, are very much concerned about the few remaining panthers. This Habitat Protection Plan map shows ten years' worth of telemetry of Florida panthers. They range from way up here around the Myakka/Peace River down here to the model (phonetic) land basins which very close to southeast of Homestead.

These cats go all over. They always have and hopefully we'll let them continue. It's an abomination to see these two together. It will impact the panther. There's no doubt about that. I don't know what's wrong with the Fish and Wildlife Service on this one.

In here the Habitat Protection plan -- Has anybody seen this by the way? And have you reviewed it?

MR. ABBEY: (Nods head, indicating affirmative response.)

MS. K. DEES: Did you consult with these people?

Okay. On Page 84 of the Habitat Protection Plan it discusses the Miccosukee Indian Reservation. Although not specifically managed for the Florida panther and other endangered species, the Miccosukee Reservation is subject to all Federal Endangered Species regulations. This mostly undeveloped tract provides habitat for many wildlife species, which completely goes against what I found inhere (indicating). Okay?

We're looking at 72 million dollars worth of work that's been put into the saving the Florida panther. We have State reports, we have private reports, we have Federal reports. And they go on and on and on. And what they're trying to do is bring back the Florida panther; not to continue to harass it and take it and harm it.

Does anybody remember this man (indicating photo)? This is a ten-year old Newsweek. This is James Watt.

A VOICE: Jimmy.

MS. K. DEES: Does this remind you of anything? Ten years ago this man lost his marbles, and I think we got same situation happening here.

Now, I'm not trying to be antagonistic. I care about these cats. I'm not here for my health. Everyday I see chipping and chipping and chipping away at the habitat of these cats.

Drilling is - is incomprehensible in the Everglades. And it's not just the Florida panther. The panther is essentially the symbol for the organization. And it's the symbol for the situation that we find ourselves in the Everglades.

And I'd really like to see this permit denied because what I see happening is if it is, indeed, allowed to go forth, it's just going to open the way, pave the way for continued drilling in this area. Continued decimation of already contaminated and stressed habitats.

It's extremely important that you deny this. And I would like to ask the Miccosukees to please think about the fact that this cat is one of the clan animals of your tribe. And if Shell is offering you that much money, every single person in this room will be happy to come up with a way to reimburse you for that so that you don't drill in that land.

Thanks.

(Applause.)

JUDGE J. L. BYRNES: Thank you for your testimony.

The next speaker is Chris Lagros. Larosa.

MS. C. LAROSA: Can I ask a question first?

Are you guys BLM or are you Shell and Bureau of Land Management?

JUDGE J. L. BYRNES: I'm with the Office of Hearings and Appeals for the Department of the Interior.

MS. K. DEES: You're with the BLM?

JUDGE J. L. BYRNES: No.

MR. ABBEY: I'm Bureau of Land Management.

MR. C. LAROSA: You're BLM.

JUDGE J. L. BYRNES: And Bureau of Indian Affairs.

MR. C. LAROSA: BIA, BLM. No Shell.

JUDGE J. L. BYRNES: No.

MR. C. LAROSA: Okay. Who commissioned this?

JUDGE J. L. BYRNES: It -- As I understand, it was commissioned by the Bureau of Land Management.

MR. C. LAROSA: Bureau of Land Management commissioned it. Okay. The big problem I have here is, see, oil and gas exploration in this country is based on risk versus reward. Okay. I see a whole book full of risk.

Where is the reward? Who stands to gain here?

Do the Indians stand to gain?

Does South Florida stand to gain?

Does it mean that we're going to have better schools here?

I mean, the risks are phenomenal. I mean you look at your own words here. In Appendix A-9, wildlife report, all right, Page 5, they address the American alligator. I'm going to read verbatim:

Large increases in population levels of alligators have resulted in downgrading its protected status. Former Federal listing has been maintained as threatened only because the alligator resembles the American crocodile, an endangered species. Crocodile distribution is almost entirely coastal in extreme Southern Florida (McDermott, 1978), so the probability of confusing an alligator for a crocodile in the vicinity of Page 116 this project is negligible.

What does it say about the American alligator? That we're not going to confuse it with crocodile doesn't have anything to do with what's going to happen.

The other thing that's real interesting is in your hydrology report, Appendix A-6.

Give me a second here. I'll find it. Okay.

Okay. Page 42. 70-100 feet below land surface, (Fish, 1980) at Section EE: Indicates the gray limestone aquifer along the west side of Broward County extends more than 130 feet below sea level, Figure 11. As indicated previously, this aquifer represents the only major source of fresh groundwater in the area of the Miccosukee Reservation.

They're the only people that stand to lose substantially. They're the only people that are tied to anything that's irretrievably bound to this well. If this well fails, if you have a contamination, they're the people who have no fresh water.

What's there remuneration? Where's the risk reward? They're putting at risk their water. What are they making? I don't see anything hereabout -- Where is the nearest well that has anywhere from - from - from ground zero to 1500 feet below sea level, where is the nearest well that's producing commercial quantities of hydrocarbons? Does any of you know?

MR. ABBEY: The nearest well?

MR. C. LAROSA: Nearest well com -producing commercial quantities of hydrocarbons high?

MR. ABBEY: Would be in Raccoon Point. Big Cypress.

MR. C. LAROSA: Where is that?

MR. ABBEY: Big Cypress.

MR. C. LAROSA: Big Cypress. How far is it? Mile? Half mile? A thousand feet?

MR. ABBEY: Over ten miles.

MR. C. LAROSA: This is rank wildcat then. Right? So you got a rank wildcat and you're putting at risk the aquifer of an entire population for a rank wildcat? What - what - what - what are recoverable resources? What have they recovered from Raccoon Point?

MR. ABBEY: I don't have those quantities.

MR. C. LAROSA: You don't know what they recovered?

MR. ABBEY: Yeah.

MR. C. LAROSA: So what are we talking about potentially here? We got an unquantifiable return for a quantifiable risk.

I mean, is that the way we do business in America? Maybe that's why the Japanese are kicking our ass. (Applause.)

JUDGE J. L. BYRNES: Thank you for your testimony.

The next speaker is Madeline Blair.

MS. M. BLAIR: I'm Madeline Blair from the Florida Turtle Society. I founded it and I'm President.

I agree with everybody that's against the well being put in for the reasons they state. But also one person mentioned that it's going to be shipped out of here, I guess out of Port Everglades eventually. Our reefs are in bad shape now. This is from a Navy seal man who has been down there and seen it. And I'm not talking about Pennekamp. Off of Fort Lauderdale and Hollywood there are sections of the reef that are dying now. The sewer - the city sewerage goes out the big thing, you know, that got ruptured awhile back. It should becoming out of there clear. You shouldn't be able to see any difference. He has been out there and seen matter coming out of the pipe.

All the old hotels, they have pipes going out to the ocean and they dump.

So we got that killing the reefs in sections. Now all we need to do is have a ship go out there and have an accident. Also, like people say, you're going to have a lot of animals killed when you have men and equipment going back and forth day and night. And they'll probably be working at night. You're going to have a lot of animals killed.

The animals are going to be scared away, a lot of them that the panthers live on, and that's going to be a big problem. I don't know why we can't -- I thought we were supposed to push for having propane vehicles in the future. I thought we were going to be passing a law soon where we could convert our vehicles to propane and would be very, you know, extremely clean. You go by these dumps at night and got pipes coming out and you can see the methane being burned.

Why can't we go, like they say, FP&L isn't, you know, until they can get their little hooks into it for money you're not going to see any kind of solar energy being used. It's just a shame. And you damage the water you're damaging your - your lower life, your frogs and your turtles. And there's so much that lives out there. You damage all these animals. And it's a chain reaction. And you're just going to be killing a lot of animals eventually.

And that's about all I have to say. That I'm against it and I represent a lot of people. And why can't we develop -- I ask you -- We've allowed strip mining and then we had to have a big battle to make them fill in the area and turn it back to a somewhat normal landscape.

We have problems in little Everglades with flooding. Then they say we got to kill the deer and kill the alligators because they're going to die anyway.

You want to put wells in there and everything, but you don't talk about anything they're going to do to help the environment.

Why aren't they building some kind of big storage area out there where they can store this water instead of flushing it out into the ocean when we get too much out there because in the rainy season, like if we have -- Every three years or so we have 16 inches of rain, and then we're pumping it out into the ocean. We need to stop that. And they say, "Oh, we can't do that."

Well, you know, why don't you put your money into developing a situation where you can save it and store it and back-bump it instead of only pumping it one way.

So that's about all I have say. That I'm against it, and a lot of people I know are.

JUDGE J. L. BYRNES: Thank you for your testimony.

(Applause.)

JUDGE J. L. BYRNES: The next speaker is Karen Power. Karen Power.

MS. K. POWER: I didn't know I was supposed to speak.

Well, I'm Karen Power and I'm a tortoise. And I live in Davie. And I had to move out into the Everglades because a lot of the people moved to where I live. So I had to move out there, which is fine, because I like to have people around me. But if they start digging for oil, I'm going to die because I'm too small and little to run away as fast as maybe the deer. So I really wish you would reconsider or Shell would consider that we don't need oil.

That's all.

(Applause.)

JUDGE J. L. BYRNES: Thank you for your testimony. The next speaker is Bernard Yokel.

MR. B. YOKEL: Mr. Abbey and members of the panel, my name is Bernard Yokel. I'm President of the Florida Audubon Society and I'm here representing the Society.

I thank you for this opportunity. The Audubon Society is the oldest and the largest environmental organization in Florida with forty thousand members in 46 chapters distributed throughout Florida.

I don't envy you your task tonight. This is a difficult job. But it's -- I suppose it's something that has to be done. But I must say I share the frustration and the sense of outrage that I think you heard in this audience tonight.

I don't really believe we need to be here. I think the answer to this question is - is rather obvious and to belabor it is in some - to some extent a waste of time.

Florida Audubon joins its chapter Broward Audubon Society in opposing this project. And you heard from Barbara Ziess earlier with those - with that position.

Over 20 years of exploration in South Florida has produced over 200 exploratory wells, but this one is different. For the first time in modern history there will be oil exploration under the water conservation areas. This constitutes an intrusion. Should this well produce economic deposits of hydrocarbons, there's going to be increasing commercial pressure for production pads within water Conservation 3-A and perhaps other water conservation areas depending on the quality and the volume of the find.

The Everglades system from Orlando to Florida Bay has been drained, ditched, diked, flooded, polluted, fragmented, mismanaged and generally exploited for the convenience and profit of others often with little thought to the consequences locally or downstream.

This destruction has been aided and abetted, unfortunately, by Federal, State and local government agencies. The permits have been granted and the destruction goes forwards.

The Federal Government is reviewing here tonight another permit to intrude on the Everglades system involving some of the most sensitive habitats remaining south of Lake Okeechobee.

If the Federal Government is sincere about protecting the Everglades -- And I would like to think that the Clinton Administration has made some commitments in that direction -- then let the protection start here.

Florida Audubon has discussed the concept of this well, the idea of slant drilling with Shell representatives in the past. And we have said, Well, if - if there is no intention to put pads actually in the water conservation area, where the South Florida Water Management District has in the past rejected those applications, if there is no intention, then commit to that up-front. Indicate that there will be no permits issued to actually drill in the water conservation areas.

Shell Oil has refused to make those commitments. And I think that - that suggests that there is at least consideration of that opportunity should the exploratory efforts prove fruitful.

You've heard a lot about the cumulative impacts and the deficiencies in that section. I would underscore that. We will - we will submit some written comments and be more specific, but there is - there is no part of the EIS that is more sensitive or more important than that which deals with cumulative impacts. It gives you some indication of what is going to happen over time. And this has been handled in a very - I'd say - insensitive and inadequate way.

We join Broward Audubon in strongly opposing the issuance of this permit.

Thank you.

(Applause.)

JUDGE J. L. BYRNES: Thank you for your testimony.

Next speaker is Jackie Malloy. Jackie Malloy.

Okay. Brian Anderson. Brian Anderson. No Brian Anderson.

That will be a switch.

Mike Scott. Mike Scott.

Mark Shore.

MR. M. SHORE: Good evening. I'm Mark Shore. I'm here on behalf of myself. I live in Ft. Lauderdale and I live at 500 Northeast 17th way.

It doesn't take a rocket scientist to read and understand data which has been accumulated over the years showing the significant deterioration to the Everglades, expanding nutrient fronts from agricultural runoffs have caused oxygen-depleting and suffocating algae blooms. Backwater fish are showing signs of mercury poisoning and other toxic poisoning. Entire species of birds have been decimated. In fact, there was an figure brought up here tonight. As alarming as it sounded tonight, it's sounded just as alarming every time I've heard it or read it. 95 percent - 95 percent of the Everglades wading birds have disappeared since the turn of the century.

I've canoed and camped in the Everglades for the last 25 years. I can tell you that I have experienced firsthand the unsubtle and the progressive diminution in the water quality and the depletion of the animals species in the Everglades.

The Everglades is in critical health. Some would say it's dying.

Drilling for oil in the Everglades is akin to kicking one who is already down and mortally wounded.

Shame on you to the Miccosukee Indian leadership for attempting to put blood money from our mother earth ahead of what should be the uncompromised protection and preservation of our unique and precious Everglades.

Thank you.

(Applause.)

JUDGE J. L. BYRNES: Thank you for your testimony.

The next speaker is David - is it Michayluk? M-I-C-H-A-Y-L-U-K.

MR. D. MICHAYLUK: I don't know why you have this thing set up. For one thing people can't see what you're talking about. They can't see your faces.

What really matters here are the people out here. Unfortunately most of them have left because a lot of the people have tended to be a little long-winded and people tend to lose sight of the reason why we're here.

We don't want this in Florida. It's bad. Just plain bad. And I don't know why you people are sitting here. You look like you should take Vivarin or something to get interested in what we have to say here.

Bottom line is the bottom line. Nobody wants this here. It is not good for the environment. It has never been good for the environment anywhere they've ever done any type of drilling or activity of this sort.

I mean, just the fact that you're here, I feel you ought to be ashamed of yourselves that you're even giving any of this validity.

What are you going to tell your children when you get older, if your children say, Daddy, what's a Florida panther? What's a manatee?

Wouldn't you like your kids to see that? I know everybody out here, they'd like their children to see that. I would like my unborn children to see that.

And I can tell you one thing for sure. If things like this happen, it's not going to be here in the future.

(Applause.)

JUDGE J. L. BYRNES: The next speaker is Mark Schram. S-C-H-R-A-M.

MR. M. SCHRAM: I reside at 4940 Southwest 12th Street in Margate. And I have to say let me apologize my for my less-than-corporate attire. I wasn't really aware this was going to be open public forum.

To begin with, I don't think that you will find anybody - you won't find anyone who is more committed or supportive of the rights of any Native American to manage their own interests. That the BIA is still under the historically useless eye of the Department of the Interior is a continuing travesty. History will bear that as true.

I was born in the State of Louisiana. I grew up with an oil well in my backyard. And I've see the impact both economically and ecologically to my former home and to the Mississippi delta in general. The drilling in the Gulf of Mexico and throughout the entire south end of the state while deemed environmentally safe when it was first begun has turned into nothing more than a murder for the estuaries and Echafaline (phonetic) basin in general.

While not entirely all of this is due to drilling exclusively, the added trafficking management and exploration that is associated with this business is part of the slow death.

The bottom line: You cannot pay me to eat an oyster that has been raised in the delta. If this well is permitted, it will be dangerous premonition of Louisiana in the 1930s.

Please do not endanger the Biscayne Aquifer. Do not endanger the Everglades. Do not endanger my current home. Partially in closing, please refer to your own handbook currently received here, Draft, Page 460, 4.3.15 under Cumulative Impacts. Cumulative meaning some sort of a summary. Third paragraph. Construction and operation of proposed project or alternatives is not expected to cause significant cumulative impacts to air, cultural, geologic, etcetera. If someone could define what "not expected" or "significant" in relation to this particular exercise is referring to, what does "not expected," what does "significant" mean? Give me a bottom-line definition. Maybe everybody here would have a different opinion of this lease being granted.

If anyone is so concerned about the financial stability of the Miccosukee Nation, they should support their constitutional rights they're gambling and remind them their future is tied to the land. The sale of the land was foreign to native Americans prior to the arrival of the Europeans. It should remain so.

In the pacts, treaties and agreements forced upon native Americans and consequently broken by United States Government -- Who, by the way, technically is still at war with the Miccosukees and Seminoles -- a phrase that was always placed on the bottom these pacts and agreements reads as follows: So long as the water shall flow and the grass shall grow. If this well is granted, no one can guarantee that the waters will flow and that the grass will grow.

(Applause.)

Thank you for your attention.

JUDGE J. L. BYRNES: Thank you for your testimony.

The next speaker is Cara Campbell.

MS. C. CAMPBELL: My name is Cara Campbell and I live at 213 Southeast 10th Street in Fort Lauderdale.

I'm here to speak for myself and for more than 3500 members of the Animal Rights Foundation of Florida, and for those who have no voice here. I noticed, too, that the wildlife section of the impact summary no test here will be a, quote, "minor disturbance from humans and their noise."

Calling humans a "minor disturbance" to any environment may be the understatement of the eighties. And, please, we shouldn't be patronized that way.

On behalf of the members of the ARF as well as on behalf of members of non-human animals whose homes, food sources and lives are threatened by this proposal and who cannot speak for themselves, I hope you will not allow this drilling for it further endangers the Everglades and its inhabitants.

Thank you.

(Applause.)

JUDGE J. L. BYRNES: Thank you for your testimony.

The next speaker is Phyllis Briglio.

MS. P. BRIGLIO: My name is Phyllis Briglio. I live at 507 North Rainbow Drive in Hollywood.

Some of the other people who have been up here speaking before me have very eloquently stated their position on saving the animals, saving the birds, all of the wildlife of the Everglades.

I wish to emphasize very strongly here that even though Shell may do away with the panther, do away with the alligators and the egrets and the herons and everything else in the Everglades, perhaps the argument can be that we can live without all of these little niceties in our lives. Fine.

But we certainly need water, clean water, in order to survive ourselves.

Now, Mr. O'Toole earlier was the only speaker who was for the drilling. His argument was that we were taking away the right of the Miccosukee to do what he wishes with his land. That may be all well and good. But their right to contaminate our ecosystem, to mess up our aquifer, directly affects everyone here and everyone in South Florida. Their drinking water could become contaminated and what affects one area of the Everglades will automatically have an impact on the rest of us.

Now, Mr. O'Toole did admit that he owns a little piece of land in the Everglades, and that he was concerned about the legacy to his children. I would like to address Mr. O'Toole, if he is still here, and state that he should be more concerned with the legacy of their good health and good drinking water and what kind of legacy he's leaving to his children by being more concerned with lining his pockets than in anything else.

About in 1980 I used to work for Channel 10 News, and I put together a series on our water. Our drinking water. It came as a shock to me to find out that when I tried to get information from officials, I very often had to threaten them with the Freedom of Information Act. And I subsequently found out that we're all ingesting trihalomethanes, which is a carcinogen, and we have all kinds of pollutants, heavy metals, etcetera, and so many of our wells are already contaminated. How far is this going to go?

I'm all for the boycott of Shell. I'm all for any efforts anyone can make that would stop Shell from proceeding with this drilling.

Thank you very much.

(Applause.)

JUDGE J. L. BYRNES: Thank you for your testimony. Have a small technical break here. The next speaker is Bill Raymond. Mr. Raymond.

The next speaker is Craig Offner. Mr. Offner.

The next speaker is Tim Day.

MR. T. DAY: My name is Tim Day and I live in Ft. Lauderdale at 1301 Bayview Drive.

And it seems to me that one of the things that the government should decide is in entering into a partnership with Shell -- Which is, I think, what they're doing -- they're entrusting very pristine land, some of the most beautiful land in the United States or possibly the world, you're entrusting that to Shell. And the question I think you have to ask is: Is Shell a company that the people and the government can trust?

And I think the answer is no. Absolutely not.

Not three months ago Shell Oil pled guilty in Federal Court to conspiring with major oil companies to escalate the price of oil and gas during 1973 gas crisis. They pled guilty to that and suffered severe penalties.

And I think that what that is indicative of is a company that we cannot trust. Who at a time when our country was vulnerable, when citizens were lining up for miles to try to get a pint full of gas, Shell was conspiring with Exxon and other major oil companies to jack up the price. Of money. And that's really to me what this is all about: An attempt by Shell in another fashion to grab an attempt and to try to monetarily benefit.

Now, they've indicated that the chances of a major oil spill are very, very small. Those were the same arguments that Exxon made when they told the Congress and subcommittees and other committees that there was no chance of an oil spill in the Prince Edward Sound. When they argued against the double hull for their tankers, they made the exact same argument. That the chances of any kind of major spill were next to nil; that they - that they - that there was not an opportunity or there would not be a chance of any kind of major oil spill. And we know what happened there.

I think that you have to ask yourself if you can trust a particular company. If you look -- And I hope that the Bureau of Land Management and the Federal Government has looked at what Shell has done in South America.

Now, as I understand, the laws in South America are not nearly as strict as they are here. But what they have done in South America is absolutely, totally destroyed the rain forest and other water and ecosystems in South America. They have been absolutely ruthless in that regard. And they've done so because they know they can get away with it.

That shows the mind set. It shows that you have people, a corporation, that doesn't care about the environment. They don't care about people. They don't care about water. They don't care about wildlife.

They care about money. That's what they care about. And I think that the government needs to be aware of who they are thinking about joining in partnership with.

You wouldn't - any individual, if they were going to redo the interior of their house, they wouldn't hire a burglar to do that.

Well, I think likewise you would not want to entrust the very, very sacred land in the Everglades to a criminal, a convicted felon, like Shell.

(Applause.)

JUDGE J. L. BYRNES: Thank you for your testimony.

The next speaker is Lindy McCallum.

MS. L. McCALLUM: Hi. My name is Lindy McCallum. I live at 4551 Southwest 46th Street in Hollywood, Florida. And I'm a seventh generation Floridian. And that is one of the reasons why I find this entire issue so particularly galling because as a Floridian I have seen incredible changes happen to the environment here.

This environmental impact statement is an insult to my intelligence. It is completely inadequate. It does not address the ecosystem as a whole. It attempts to remove the project site from the whole context of that ecosystem.

And this evening you had told several people that this is not supposed to be a confrontational event. But I wonder if you understand how frustrated we feel because it seems to us, especially now that we've read this (indicating), that you people are not interested in doing a real environmental impact statement.

You are only interested in giving out something that could be used as a handbook on oil drilling. And, personally, it just -- It just completely removes any confidence I have at all in my government. And it makes me wonder where this country is headed.

And I won't be buying Shell products. I haven't bought Shell products since this time last year. And I don't know if you all will recall, but a man named Brian Hunt turned his back on you and spoke to the people. And I can certainly understand why.

(Applause.)

JUDGE J. L. BYRNES: Thank you for your testimony.

Next speaker is Roderick Terrell.

MR. R. TERRELL: Good evening. Thank you for a chance to address this panel.

I have a number of things which have probably already been stated, but I'll try to eliminate the ones that maybe are not too duplicitous.

Our Everglades have recently been declared a World Heritage site, International Bioserve and a wetlands of international importance.

They have been diked, drained, averted, dammed and now they are dying. It is from the number of cumulative effects. And this is just going to be one more cumulative effect.

If oil is found in this site, in this exploratory well, it will just be in a number of cumulative effects.

This draft is one of the biggest whitewashes I've ever seen in my life. It fails to evaluate the effectiveness of the plastic liner in preventing groundwater contamination. The amount of leakage which will occur should have been quantified. Further contaminants which may leach into the soil should have been evaluated from both an epidemiological study and toxicological study in order to fully evaluate the human health impacts of their lease.

The study fails to delineate the hydrologic conditions that would serve as a barrier in this lateral migration of contaminated groundwater into the Biscayne Aquifer.

This analysis also fails to consider lateral displacement and the effect of pressure caused by drilling, which could cause further contamination of underground sources of drinking water.

The object of the draft EIS failure to evaluate the consequences of the production at this site, the construction of the well itself will violate the integrity of the confining zones serving to prevent endangerment of underground sources of drinking water. Production activities are therefore fundamentally related to the exploration activities and should therefore be considered.

As a resident of Broward County I feel that this project should not go further. The exploitation of a poor Indian group by Shell is - it's pathetic at best.

The drilling - the drilling of this well should not go forward. This administration and Mr. Babbitt promised us Everglades restoration.

Is this what we would call restoration? Putting drilling for oil right next to a national park, one of the most threatened ecosystems in the world?

The alternatives that should have been considered in this draft were which direction the road should go.

Why no energy alternatives should be considered, because this is a private project, is beyond me with the laws that are in place.

We have mercury contamination. We have excess pollution from the incinerators. We have heavy metals. This drilling will bring up more aromatic - hydrocarbons. It's just the effects of it, especially if oil is found, could be - could be the last dying - the last thing for the Everglades. And I just really can't understand why we're even meeting at this point. I wrote a letter to Mr. Abbey last year addressing a number of issues that I feel that this draft does not address. Studies such as the U.S. Fish and Wildlife Service Rangers have called a canvass of the Big Cypress Reserve released February 11th, 1991 showed panther habitat as far to the east of Big Cypress, all the way to State Road 27 encompassing this drilling area.

How will Shell not impact the range of these creatures?

I think that a water quality bond should be required and testing should be done immediately for the bond - before the bond should be posted.

What chemicals may be leaked and in what quantity should have been quantified. How toxic are these chemicals and what will they do to the lower levels of the food chain and how will they ultimately affect the upper levels of the food chain.

How will produced waters be re injected and prevented from spreading among the lateral substrates and the geological faults below?

The fiscal costs in return from this project should be weighed against the potential damage it could cause.

Social costs should have been weighed against - along with ecological, hydrological and biological losses.

How much could be lost in tourism if our Everglades are completely wiped out?

Someone said 95 percent of all Everglades birds have been eliminated in the last 50 or so years. Five percent are left. What chance are they going to have if and when Shell finds oil and continues to drill more and wells?

That's all I have to say. I hope that you will go back and tell Mr. Babbitt that we don't need this project and that we can live well without it, and so can the Miccosukees.

Thank you.

JUDGE J. L. BYRNES: Thank you for your testimony.

The next speaker has recorded his presence as "Frankel." If you know who you are, you can step forward. F-R-A-N-K-E-L.

Okay. Next speaker is Sean Moch, I believe.

MR. S. MOCH: Testing one, two, three.

How are you guys doing?

JUDGE J. L. BYRNES: It works. Take my word for it.

MR. S. MOCH: I'm Sean Moch. I live 319 Tarpin Drive, Fort Lauderdale, Florida. 33301. I represent Save What's Left of Broward Community College. Save What's Left is an organization dedicated to preserving the environment.

I also represent tomorrow, the next generation adults.

The Everglades is all that South Florida has left. Stoneman Douglas fought so hard to preserve the Everglades and all of her work will be lost if drilling occurs in this already delicate ecosphere.

When it occurs, it will not only kill the Everglades; but it will kill South Florida. The plants, animals and rare trees will be lost forever. The Everglades is the last of the natural habitats. If you kill the Everglades, you will kill South Florida. Without the balance of the Everglades in our environment, South Florida will become a desert wasteland.

Stop the efforts for drilling. Think of your children and your children's children. They will have to clean up our mess after we all leave this planet. So please stop raping mother nature.

I'm willing to do whatever it takes to preserve the Everglades. If you value your future generations of adults to come and children, you should, too.

Thank you.

JUDGE J. L. BYRNES: Thank you.

(Applause.)

JUDGE J. L. BYRNES: Next speaker is Kay Magin.

MS. K. MAGIN: My name is Kay Magin. I live at 2460 Southeast Fifth Street. I'm a resident of South Florida for the past 15 years. And I implore you not to grant this permit to Shell Oil. Shell Oil -- There's been so much evidence already presented as to the damage to the Everglades. So I won't repeat any of that. But Shell Oil, being a foreign corporation, we can be rest assured none of the Shell Oil executive live here near the Everglades. They will not have to put up with the pollution that will occur or the problems or lack of drinking water that will occur here in Florida.

I also would like to -- This is an idea of mine. We should implore Shell Oil shareholders to get in touch with their corporate boards and find out what their environmental stand is here in Florida.

Thank you.

(Applause.)

JUDGE J. L. BYRNES: Joyce Tarnow.

MS. J. TARNOW: Good evening. My name is Joyce Tarnow. And I live at 531 East McNab Road, Pompano Beach, Florida.

JUDGE J. L. BYRNES: Excuse me. Is that T-A-R.

MS. J. TARNOW: T-A-R-N-O-W.

JUDGE J. L. BYRNES: Thank you.

MS. J. TARNOW: I have lived in so you had the South Florida for thirty years. I came from the Midwest where I had very little knowledge of what a natural environment was like. And coming to South Florida I was intrigued by the Everglades and by our oceans, and I have since become a SCUBA diver, a camper and a birder.

And I really feel that our government is letting us down because I have been active for almost 20 years in the environmental movement. I've seen us achieve some legislative protections, and I've seen that we've had to go and sue our government to enforce those protections. I don't think we should have to fight the government or Shell Oil.

I think what you have an obligation to do is to realize that what we have in the Everglades is vital for many, many reasons. For the environment, for the animals, for the water recharge, for the health of Florida Bay, for the lower food chain, which - in turn - gives us our fishing industry, which give us our sport fishing, which gives us our tourism. All of these businesses are - are being supported by a good clean environment.

We don't want to lose our coastal reefs. We don't want to lose our Everglades.

If you've ever been out to Everglades National Park and gone to Pahokee lookout and looked over the span of the Everglades, you would see what Marjory Stoneman Douglas wrote about in River of Grass. You would see and feel how important it is to get away from all of the buildings and the contraptions of man. And you get out in that open air and you see the sky and the clouds and something that is clean and decent. And you see some wildlife, what little is left. We can't gamble that away.

There is no way you can assure us the protection that there won't be accidents that contaminate the Everglades. We're talking about something as essential as our water supply in South Florida. People are an endangered species in South Florida, and our government is maybe intelligent but it is not wise. The overview is that we have got to stop all this energy consumption. Why aren't we doing something about alternative energy sources? Why aren't we doing something about enforcing the Clean Air Act and stopping Detroit from building these cars that continuously get less and less mileage.

I think it's time for this government, for the Department of the Interior, for Miccosukee Indians -- And I've always thought the Indians were at one with their environment. And this is certainly not many compatible with being a protected environment.

I think it's time for the government to do the right thing. We sent Janet Reno to Washington, a South Floridian who knows the environment well. And if you all do things to rape our environment, I hope she will prosecute you.

(Applause.)

JUDGE J. L. BYRNES: Thank you for your testimony.

The next speaker is Tina Gwaltney.

MS. T. GWALTNEY: Hi. My name is Tina Gwaltney. G-W-A-L-T-N-E-Y. I live in Plantation. And I'm a high school teacher, science teacher - specifically environmental science - at Marjory Stoneman Douglas High School. And I have a couple of things about the statement I would like to say. A lot of them have already been

said about the map. That was the most obvious. I wish I had asked for the full book instead of the summary, because I really could you have used the laugh about the "water foul" thing when I got it and I missed that. 26

The only thing that hasn't been mentioned that I have a problem with, if God forbid, this were to go ahead, the down gradient monitoring that was going to be done only on every two week basis I feel is totally inadequate. I think obviously money is no object if they paid 500,000 for this statement. I think it should be done on a daily basis. 33

They also say that if the contamination has to be reasonably attributable to oil and gas in order for operations to cease, don't wait to figure out what caused it. If we see any contamination, stop it, and then let's worry about where it came from.

The only other thing I want to talk about real quickly is a little bit of frustration as a teacher specifically of environmental science and how the government comes into play with that.

We're supposed to teach these kids to look at things to become educated and knowledgeable and not to go in with a bias. I don't go in there and tell them, "Oh, God this is bad for the environment." That's not my job as a teacher. I try to go in and show them all the facts, let them learn about it and then hopefully they can make their own educated decisions when they mature and are in that position. But as teacher I get things like a whole energy program that's approved by the State of Florida Education Commissioner, Betty Castor, signed it in, on an energy curriculum that is paid for by Exxon. I am here to tell you it is unbelievably biased. I only show the video tapes in class so the kids can see what kind of propaganda gets passed through, and that they have to learn to separate that from what they've learned as fact.

If Exxon is paying for our energy education and now Shell is paying for our environmental impact statement, I have a real problem with these kids feeling like they can make a difference.

We've been following this issue since last year when I came to the first hearing. I ask them on a weekly basis to bring me in current events. I don't have any problem getting articles on ecological disasters every week. Plenty of different ones. Very rarely do I get anything that's uplifting. This is probably the most depressing course I have ever had to teach, especially in South Florida. Everything is going wrong and they see that. These are 16- and 17-year-old kids.

When I came last year the project manager for Dames & Moore was a female. She had her Ph.D. in biology. I spoke with her. She actually sounded like a biologist, and that reassured me because I felt certain that she would find not in favor of doing this. She has obviously left and gone to work for South Florida Water Management. So much for that.

The only thing I can hope that we do with this is, as everybody has said, do the right thing. I would love to go back -- I wanted to bring my classes here. I wanted the kids to come. We've been following the articles. They knew about the hearing. The article that came out yesterday Sun-Sentinel. They told me, "Forget it. It's a done deal. That's their attitude. It's a done deal. You can't fight city hall."

Don't let me show them that. That can't be what they have to look forward to. You can't. If I'm here to teach them not to be radical, not to go out and be violent, not to have the Rodney King kind of violence that comes from that much frustration, we've got to show them that this works, this forum is effective.

Please, let me go back and show them that it does. And, also, let's go back and let Marjory rest a little bit. She just celebrated her 103rd birthday. Let the headlines tomorrow say, "They said no."

(Applause.)

JUDGE J. L. BYRNES: There were several people who had indicated they would like to speak, but weren't in the room when their names were called. Is either Mr. or Ms. Frankel here? If you would like to step forward.

Craig Offner. O-F-F-N-E-R.

Bill Raymond.

Brian Anderson.

Jackie Malloy.

Paul Barnes.

Thomas Martin.

And David Hauptman or Houtsman.

Having exhausted the list of people who indicated that they wished to speak, is there anyone present who would like to address -- You, sir. If you would step forward. If you could state your name and address.

MR. G. COUNTS: My name is George Counts. I live 2449 Nassau Lane in Fort Lauderdale.
JUDGE J. L. BYRNES: Could you spell your last name please.

MR. G. COUNTS: C-O-U-N-T-S.

As a backpacker in the Everglades and someone who doesn't drink bottled water, I'm very concerned about the drilling in the Everglades of Shell Oil Company. I come from a small town in West Virginia. It's right in the heart of the Appalachia. The county barely has 30,000 people and the town is probably about the size of the Miccosukee Tribe.

The unemployment rate is about what it is in Miccosukee Tribe. But just a few years ago a large corporation came into this town and offered to put in a hazardous waste dump. They were going to fill in an area between the mountains and put everyone to work.

So they had a big fight in the town about whether to go along with this. It split the town wide open. So they eventually voted for it. Company came in and did some work, a little bit, and then the whole thing fell through. Much of the area is wrecked. The town is divided. And this is what happens when you have people that are desperate for money and large corporations try to take advantage of them. Now, if you want to verify this, read Harper's Weekly last June. The story was in there.

But to get on with the criticism of the environmental impact statement, I would just like to say that it is not objective at all. It's constantly filled with comments like "impacts will be short-termed," "minor," "of low magnitude" or "insignificant." And this concerns me that there was not one place in the impact statement that whether the people that were authoring the impact statement spoke up about potential harmful impacts.

Another thing I'm concerned about in this statement is that the - the slant drilling. In other words, we're going over almost a mile from where the drill rig is to the bottom hole. We're going 90 percent of the recommended limits for slant drilling in this particular area. This concerns me. This only sets up the risk factor that's almost insurmountable in such a fragile ecosystem.

It stated that there's going to be plastic liners under the drilling site. Well, we know that plastic liners have failed in Niagara Falls -- Same type of liners -- and they leak. And the monitoring system -- Well, we know how the monitoring system works. It's left up to the company to monitor, to pay people to come in and monitor it. And this is like letting the fox watch the hen house.

The Everglades is already staggering, as other people pointed out, from urbanization and agriculture. But I think this improved pasture, this one little tiny spot that's called "improved pasture" over and over and over again in this statement is vegetation. And it's vegetation we don't have very much of in Broward County.

Broward County is a unique county in that only one-third of this county can be developed. The rest of it is conservation area. So as a result we have one of the highest impervious surfaces in the entire State of Florida right now. So even though some of these little types of grass that are in this area are not something endangered, it's vegetation. And we need vegetation in this area desperately.

People have gone over and over about the health and safety aspects, about the human error. We all know that human error is the thing that's going to cause the problem, most likely.

This well is conveniently located between two aquifers. The first map that they had up in the display area showed our aquifer and one on the western side. And came down just like this (indicating) and right in the middle is the spot for the - for the drilling. And they said it was to show how accurate - to show how much they know about exactly where the aquifer is located, they said it's five to ten miles from the reservation. I mean, this is how they're able to pinpoint where the aquifer actually is.

Well, you heard testimony tonight that this aquifer is much closer to that reservation than that and possibly even on the reservation in some places.

The - the disturbing part of this is that if this goes through, it's merely a pilot project, that's going to bring more and more drilling in the 70,000 acres that the Miccosukees have. Certainly don't want to set a precedent here.

As far as the air quality, the consultants go on to point out that Broward County is a non-attainment area for ozone. South Florida is.

Well, this has been a recent thing. And even with this, we have some of the cleanest urban area in the nation. Excuse me. Urban air in the nation. And recently the exceedences of this non-attainment have not occurred. So our air quality is not as bad as this report would lead you to believe.

And the trucks and the drilling will contribute more to the cumulative impacts on our - on what we have as clean air here.

They say there is a going to be speed limits on the trucks. You know, well, who's going to be there to enforce it? Are the trucks going to be checked for emissions? Are the trucks going to be checked for noise? These things are not mentioned at all.

As far as dumping, a lot of the - and the drilling - as far as dumping, a lot of the water used in the drilling back down and injecting it back into the ground. Unfortunately the casement, the cement casement around this pipe is not going to be impermeable.

It's very difficult when you're working with something made out of cement and try to make it impermeable and to go there -- And you have to sit there and you have to vibrate it. And you have to shake it to make sure that all the cement goes down and doesn't have any porosity in it.

You tell me you're going to go down four thousand feet with cement and not have any porosity and make it impermeable. I just can't buy that. And I really don't think this is going to happen. You're not going to be able to get vibrators down there to vibrate these casings to make sure this cement is where it should be.

As far as no wetlands in the area. This one so-called improved pasture may not be a wetland, but it is inundated quite a bit of the year and there are areas right around it that are construed as wetlands to the north, to the west and to the south. This rig would be thrust right in the middle of cypress heads, marshes, so on and so forth.

Now, as far as the wildlife, once again, the map shows the range of the Florida panther. And just like the aquifers, the drilling rig is right in the very middle, just over the edge of the range of Florida panther on each side. In other words, when we look at the radio-collared panthers, we're only look at less than, say, 50 percent of the population. If that. So we really don't know where all the panthers are. And most of us that go in the glades have pretty good idea they use this corridor along with a lot of other protected species. There's something like 35 protected species that frequent this area. Wildlife species. To get into the abandonment of such a well, this is another problem. In other words, the well will be abandoned, but the roads will still be there. And the roads will be improved and more people will come. More development will follow. And this will create more problems for the Everglades.

The Everglades don't need anymore problems. The report refers to the few - the land use plan of the Miccosukee Indians as being indefinite. Well, Broward County happens to have a land use plan, and this land use plan surrounds the Miccosukee Indian Reservation. Every single spot surrounding this reservation on Broward County's land use plan is conservation. So just in case you're misled by some of the remarks about land use plan, I would like you to know that fact. Well, in closing I'd just like to say that I recommend that no action alternative and that we take great care to make sure that this these protected species are protected as they should be and that our water supply is also protected.

Thank you.

(Applause.)

JUDGE J. L. BYRNES: Thank you for your testimony.

Is there anyone else that wishes to present any testimony on the draft environmental impact statement?

Yes, sir.

MR. J. PODGER: I've spoken before. If someone hasn't spoken, I'd wait first. But I would like to add some --

JUDGE J. L. BYRNES: Is there anyone who has not addressed the issue before wish to come forward?

MR. J. PODGER: Thank you for the opportunity. Again, I'm Joe Podger with Friends of the Everglades. P-O-D-G-E-R.

In my previous turn I failed to mention what this display was. And I think it's probably appropriate to just see that it's entered in the record as an outline of part of what I understand to be some of the concerns of NEPA. That involve the socioeconomic impacts as relates to the environment. Part of the environmental impact would be socioeconomic. And in terms of the economics, this little graphic here is intended to bring home and just highlight some of the things that the Everglades does as a public utility and as a provider for the region. Things that normally are not quantified and as a result don't get into the cost benefit balances and decision-making.

We wanted to bring them to your attention to let you know that we think that at minimum these features of the economy of South Florida must be considered as part of the circumstances surrounding any consequential effects of a drilling operation that finds oil and results in subsequent development of a production well.

Secondly, I failed to relate to you something that I had discussed with my boss, Mrs. Douglas. You have to understand Mrs. Douglas just celebrated her 103rd birthday last week. And if she could have been here, she'd have been here. But she just - she doesn't have the go-power to stay up at this late hour to do it.

She reminded me she is the last surviving member of the committee that formed Everglades National Park. And she first got involved in that committee in about 1925. The park was built, but at a much smaller version than what the committee had hoped for. And, frankly, if Marjory had her way and that committee had prevailed with some of its thoughts, the territory that you're looking at now would have been in Everglades National Park.

Now, I want to bring to you the thought that it functions like one. It is basically the dog upon which the present Everglades National Park resides as a tail. It is the bulk of the system that we all have been talking about all night. And here you're looking at a question as to how to make a decision. Socioeconomic decision, environmental, physical health decision that were this to be Everglades National Park on the other side of that levee, there would be no contest and no question, we wouldn't be here. If that was designated by any of our official bodies in Florida as a critical area of State concern, we probably wouldn't be here.

If that was a drinking water reservoir in conservation 3-A a la the kinds of service reservoirs that you see all over the Northeastern United States, we wouldn't be here.

It is a sole source area under the designation of '78. It's the stream flow source area for that part of the watershed. But I want you to take home with you the thought that it is national park. It is reservoir. It is all these things.

And that's, I think, the thinking that comes automatically that people like Marjory Douglas that doesn't even think it's worth putting it into words because you should know that. And I just want to leave you thinking that as I go down and point out that's it's not only a park, but if we don't have that system, we have to pay out of our pocket for every one of these things. Not the least of which has not been on the thing in specifics, but the entire economy of the Florida Keys depends on the restoration of the water flows through the river of grass. And that is the livelihood for over 147,000 people plus all the millions of tourists that go down there and the fate of the national park itself.

You're looking at something that is only one blip on that chart. We like to say that the Everglades is like a heart patient and this territory where the well site is actually the cardiac ward. The patient needs a bypass. It needs to get the flow going from the heart in the upper valley through the Lake Okeechobee into the rest of the ecosystem. And to have these kinds of things annoying the patient while it's in Intensive Care is not going to make the patient recover. That's the mental set we bring to you and we hope you can keep in mind.

Thank you.

(Applause.)

JUDGE J. L. BYRNES: A last-minute person has asked to be able to speak.

Mindy Stone. Would you step forward.

MS. M. STONE: Mindy Stone.

JUDGE J. L. BYRNES: Would you care to state your name and address for the record please.

MS. M. STONE: Yes. My name is Mindy Stone, 1506 Southwest 12th Street, Fort Lauderdale.

I am here on behalf of my State. I'm a third generation Floridian. I have a proud heritage and a proud appreciation for my State. And I see it going down the tubes. And I see it because of business and people who come in and set up shop and don't care about the pristine climate and the agriculture and the things that people come here for.

And I don't think you all see Florida for what it really is. I think people who are business to make money see money as the motivator and nothing else. They go around with blinders on and I don't think it's fair.

I'm very nervous.

I wish you all knew what it was like to not have a lot of money and see things for what they really are. See that we need to take care of this environment and our country and preserve it for your future, my future.

As it stands right now, I don't know if I want to live here anymore. And that's pretty sad because I don't think people care. And I'm very upset because there was no notice given out to the public about this hearing, not like it should have gotten. It should have been around the front page. It's very important. I was told when I came in here ten minutes ago that this was over. And if I didn't know any better, I would say this guy was just trying to keep people like me out because I wanted to make a stand. And I think that was wrong that I was told this was over and I could have gone home.

But I'm one of a few people here who are trying to stand up for what we believe in. And I think you should reconsider and go somewhere else because our Everglades are very important.

(Applause.)

JUDGE J. L. BYRNES: Thank you for your testimony.

Once again, is there anyone else that would care to say anything regarding the Draft Environmental Impact Statement?

No one?

Yes, ma'am.

MS. M. BLAIR: Are you part of the -- Before Bush went out of office he was starting to get rid of the wetlands. Are you part of this group?

(Laughter.)

JUDGE J. L. BYRNES: Ma'am, I'll tell you what, after we close the hearing, the representatives from BLM and I will be here and we will be happy to answer any questions you might have regarding any of this that we're capable of answering.

MS. M. BLAIR: I'm a native. I've lived in Broward County all my life. And you can go down to the University of Miami and talk to biologists down there. A lot of people have this old fashioned idea that's going to be like a hundred years before we know if the human race is going to survive.

But the biologists down there at the university will tell you that it's going to be within the next 50 years that we're going to know whether we're going to survive. And you all are just polluting everything. You're polluting the ground, the air, everything. You know, you all never learned anything. Now you're polluting outer space. We got space junk floating around up there. There was something that was going to come down the size of a school bus. You all never learn. So I'm hoping that you take this elsewhere. Take it to Washington. There's got to be oil there. There's lots of other stuff there. There's bound to be oil in Washington.

JUDGE J. L. BYRNES: On that note, I will adjourn this public hearing. I thank you for participating and extend the gratitude of the Department of Interior.

(Whereupon, the hearing was adjourned.)

CERTIFICATE

I HEREBY CERTIFY that the foregoing, pages 1 to 173, is a true and correct transcription of my stenographic notes of the testimony taken and proceedings had before the Honorable JAMES L. BYRNES, Chief Administrative Judge, at the Public Hearing held at the Fort Lauderdale Convention Center, Fort Lauderdale, Broward County, Florida, on the 14th day of April, 1993, commencing at 6:03 o'clock, P.M. IN WITNESS WHEREOF I have hereunto affixed my hand this 6th day of May, 1993.

Registered Professional Reporter Certificate of Merit

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SECTION 5

COMMENT LETTERS

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I-1

4810 Seand St.
Hollywood, FL 33021

April 21, 1993

To: Whom It May Concern:

This is to inform you that I am
opposed to any exploratory drilling in the
Everglades. I know you share my
concern for this area that has already
been taxed by population growth,
increased water demands and the sugar
cane industry. This fragile ecosystem
does not need further strain. Please
respond.

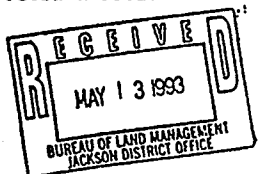
Sincerely,
Rose Adams

I-2

1816 S.W. 53rd Avenue
Plantation, Florida 33317

May 12, 1993

Robert V. Abbey
District Manager
Bureau of Land Management
411 Briarwood Drive, Suite 404
Jackson, Mississippi 39206



Dear Mr. Abbey:

This letter is in response to the public meeting held at the Greater Fort Lauderdale-Broward County Convention Center on April 14, 1993, regarding the proposed drilling of an exploratory well on the Miccosukee Indian Reservation.

Without the benefit of having a full comprehension of the issues involved (pertaining to this particular permit application) prior to attending that meeting, I observed members of the public presenting some of the controversial issues very clearly. It was overwhelmingly in opposition of the proposed drilling with valid concerns about the effects on the environment. I tend to agree.

Florida has a very precious ecosystem that obligates residents, the local communities, the State, and the Nation, equally, to protect it from unnatural destruction or disruptions. The grave threat of oil drilling to the environment should not be tolerated. In the event of a disaster, the hazardous price to be paid environmentally is much too great to risk the chance. It clearly outweighs the transient benefits of oil development in the area, no matter which way you slice it.

The Miccosukee Tribe of Indians have a serious request for assistance to improve their health, housing, and educational needs. This should not be neglected. Generally, I do not believe that the government has jurisdiction over lands owned by Indian tribes, however, in this case, any possible contamination resulting from an oil spill will have a catastrophic effect on over 4 million people as well as all elements of the ecosystem. The Bureau of Indian Affairs must formulate means of generating income for this tribe other than the risks involved in searching for mineral resources.

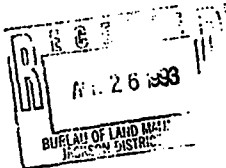
This is obviously a very complex matter. I certainly do not envy the positions of those acting as intermediaries. Perhaps it would be beneficial to post a "DO NOT DISTURB" sign on precious lands to prevent any application to trespass. I hope the government does the right thing in this and other similar circumstances.

Thank you for your attention to the matter.

Sincerely,
Maisy Alpert
Maisy Alpert

I-3

Mr. Robert V. Abbey
District Manager
Bureau of Land Management
411 Briarwood Dr. Suite 404
Jackson, Mississippi 39206



1105 Merion
North Lauderdale, FL
33068
April 21, 1993

Dear Mr. Abbey,

I am a student at Broward Community College, in Davie, Florida, who until recently, was unaware of the existing proposition of well-drilling in the Everglades. As a student in a Geology class, I am now more knowledgeable about the environment and am quite disturbed by this proposition for the following reasons.

Though the Everglades may be abundant in petroleum, there are so many concerns that I feel are not being considered. Though the mine may be built in an uninhabited section of the land, this oil must be transported through a pipeline to an easily accessible area. This may seem acceptable, but perhaps this pipeline disintegrates or ruptures? What happens to the existing petroleum? Naturally it empties into the ground and any existing underground water. As I have learned from my Geology class, this petroleum then pollutes the plants, water supplies, and any animals that come in contact with this. Considering that the Everglades is home to various animals and plants, this could cause great devastation, and perhaps extinction. Is this something that can be ignored?

Besides this risk to the environment, this oil well could prove disastrous to humanity. The ground is exposed to a percentage of this petroleum, and the remaining is allowed to enter the water table. This could affect the supply of drinking water and prove disastrous to the population of South Florida. Combined with the already enforced water restrictions, this could become an enormous problem.

21

45

I-4

For these reasons, I feel that the proposition of oil-drilling in South Florida's Everglades should be thoroughly examined and evaluated. Though the world is craving modernization and advancement, I am sure that you would agree that "ancient" things such as plants, animals, and drinking water are much more important.

Sincerely,

Wendy M. Altman
Wendy M. Altman

I-5



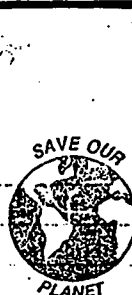
BUREAU OF LAND MANAGEMENT
JACKSON DISTRICT OFFICE
George Amelth
900 River Reach Dr. #311
Fort Lauderdale, FL 33315

Dear District Manager!!

Thank you for my "Summary" for Oil drilling by Shell Oil with Nicomache Reservation!!!

I remain opposed to such drilling as no consideration is given to an accident that will pollute our Florida water supply!! Also finding any commercial amount of oil is very unlikely, & therefore makes the risk of water pollution not worth the effort!! Sincerely, George

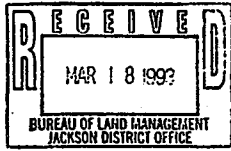
I-6



George Amelth
900 River Reach Dr. #311
Fort Lauderdale, FL 33315

Dear Mr. Abbey!!
I am writing to you, after reading today's newspaper account of last week's Board Meeting, to state my outrage that you & Shell Oil have already decided to drill for oil on Indian land & that this meeting, as before as you've already decided in favor of Shell Oil!! You should resign your position as you are not doing your job!! I'm sure Shell Oil will

I-7



Dear District Manager:

I am a concerned South Florida resident asking you to please stop Shell Oil Co. from exploratory drilling in the eastern Everglades.

May I remind you that this is a CONSERVATION area, where our fragile environment is supposed to be PROTECTED, not threatened by a company whose only purpose is to make a profit at the expense of our main source of fresh water.

I am vehemently opposed to this drilling, and will do everything in my power to see that it is stopped.

Thank you for your time.

MAURZ ARNOVSKI
7520 BUCCARCA AVE.
NORTH BAY VILLAGES FLA 33141

I-8

Please Do NOT let
Shell Oil drill in the
Everglades.

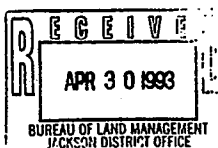
Thank you!

Stella Asken
Plantation, FL



I-9

Jackson District Office
Bureau of Land Management
411 Briarwood Drive
Suite 404
Jackson, Mississippi 39206



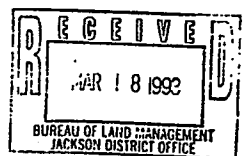
To whom it may concern:

As a south Floridian who values the environmentally sensitive Everglades, I am adamantly opposed to Shell Oil's plans to drill for petroleum there. No number of precautions can assure that contamination will not eventually occur, due either to a natural or human-induced disaster. I urge you to make all efforts to thwart Shell's plans to exploit the Everglades. . . before it is too late for our wildlife, our economy, our water supply, and the preservation of the unique and natural beauty of the Everglades.

Very Concerned,

Mark Hensley
MARK HENSLEY

I-10



Dear District Manager:

I am a concerned South Florida resident asking you to please stop Shell Oil Co. from exploratory drilling in the eastern Everglades.

May I remind you that this is a CONSERVATION area, where our fragile environment is supposed to be PROTECTED, not threatened by a company whose only purpose is to make a profit at the expense of our main source of fresh water.

I am vehemently opposed to this drilling, and will do everything in my power to see that it is stopped.

Thank you for your time.

Miriam Assef
735 SW 99th
Miami, Fla.
33174

Miriam Assef

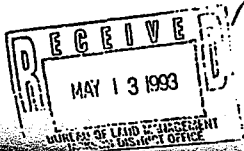
I-11

To whom it may concern,

I am a student at Broward Community College. It has been brought to my attention that an oil well is proposed for the Everglades. Personally, I have no problem with drilling the well. The environmental impact would be little if any. I do, however, have a problem with the method in which the oil will be transported out of the Everglades. I am troubled with your failure to address this issue. Our water supply must take a priority standing in any drilling proposals. Until you address this and give adequate reasons on how the water will be protected, my entire family and all of my friends are going to boycott Shell.

Sincerely

Jessica Azola
Azola



21

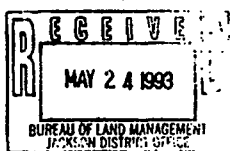
45

I-12

May 15 1993

BLM
Jackson MS 39206

Gentlemen



Please be advised that I am in full support of the findings in the draft environmental impact statement on Shell Oil Company's drilling plans on the Miccosukee Indian Reservation.

Karl B. Baden

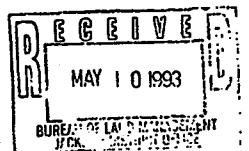
Karl A. Baden
612 Oak Hill Circle
Sarasota, FL 34232

4

I-13

Sheezan Bakali
11488 Whispersound Dr.
Boca Raton, FL 33428

Robert Abbey
Jackson District Office
Bureau of Land Management
411 Briarwood Drive
Suite 404
Jackson, Miss. 39206



Dear Mr. Abbey:

Please do not allow the Shell Western company to drill for oil in the Florida Everglades.

The land is home to many endangered species and is the source of much of South Florida's drinking water.

Drilling for oil makes the area vulnerable to spills which could hurt the already shrunken land area.

Progress is important, but it is not fair to leave none of the land untouched. Please do not violate this piece of precious earth.

Sincerely,
Sheezan Bakali
Sheezan Bakali

I-14

Louis B. Danashy
2595 Countryside Blvd.
Clearwater, FL 34621

Dear Sir:

Re: Proposal by Shell to drill a well in
South Florida on the Miccosukee Indian
Reservation in western Broward County.

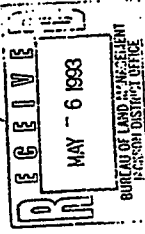
Since recent investigations indicate
potable groundwater will be unaffected
by the proposed drilling. And wildlife
does not support significant species,
or populations of wildlife including
such species as the Florida panther
and the Everglades snail kite.

It is also my opinion that
that the BLM, Bureau of Indian Affairs,
and the agencies in the draft environmental
impact statement, complies with all
applicable regulations. And that
the permit be granted to drill the well.

Sincerely,

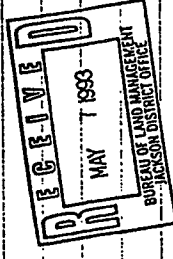
Louis B. Danashy

May 7, 1993



I-15

3 May 1993



824-All Permit
Aute 204 Jackson MS
99926

handman:

I would appreciate your looking into form

on 824-204 DE 15 for the Indian reservation

in Broward County, Florida

Respectfully

Yours sincerely

F. L. BARNHART

On February 28, 1993

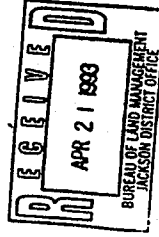
5000 G. W. Center, Ft. 33509

F. L. BARNHART

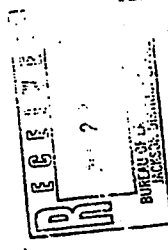
I-16

Strongly oppose
drilling in the Ever-
glades due to the
fragile environmental
and water system of
Florida.

Louis B. Danashy
719 S. S. 9th St
48. S. 7th 33316



I-17

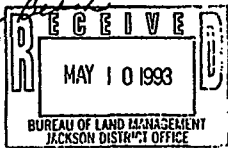


is a full time 20 year
resident of south Florida.
I am in opposition to
allowing shell oil drill
for oil. Please protect
our Everglades and our
Area. Chris Beck

I-18

Please don't permit Shell Oil to drill in any part of the Everglades. The Everglades have been damaged enough by other attacks on its environment.

Patrick M. Bishop
8840 Gulf Blvd.
St. Petersburg, Florida
FL 33706



I-19

April 21, 1992

Dear Mr. Abbey;

Just as this country is on the verge of the electric car; it seems a great miscalculation to explore for oil in an area, where with any inadvertent problem, the 45| draining water supply for a greatly expanding population could be hurt or even possibly destroyed.

Please save the Everglades and the underlying fresh water aquifer for the millions of people who hope to live in and enjoy South Florida!

Thank you for considering carefully this important matter.

Sincerely,

Judy Bissell

4409 Waxwing Court
Boynton Beach, Florida 33436

I-20

DARRELL L. BLACK
385 MACEWEN DRIVE
OSPREY, FLA 34229

May 11, 1993

Bureau Land Management
411 Briarwood, Suite 404
Jackson, Mississippi 39206

RE: Oil well drilling
Missaukee Res.
Broward Co, Florida

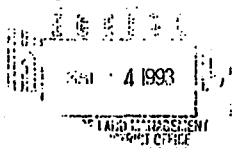
Gentlemen:

It has been brought to my attention that you are soliciting comments from South Florida residents on proposed oil drilling on the Missaukee Indian Reservation in Broward County Florida -

As a resident of Sarasota County Florida who has knowledge & experience of over 40 years of work in this work I can unequivocally support this activity. It is past time that Hooligans from that oil & gas development & environmental concerns can operate successfully side by side!

Sincerely,

Darrell L. Black



I-21

Mary D. Blackman
100 N.E. 26 Street
Pompano Beach, Florida 33064

Robert Abbey
Jackson District Office
Bureau of Land Management
411 Briarwood Drive
Suite 404
Jackson, Mississippi 39206

Dear Mr. Abbey:

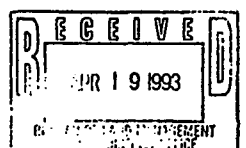
The proposed oil drilling in the Everglades is an outrageous defiance of logic and reason. The evidence against the proposal is so overwhelming as to be obvious even to a child. 45| To jeopardize our precious water supply, which is likely to prove inadequate anyway, is totally reckless. And the habitat destruction that will occur is also intolerable. As one of the speakers pointed out at the hearing in Ft. Lauderdale, the drilling should not even be under consideration. It seems the hearing (yesterday) was just a required ritual, and the Bureau has already decided to allow the permit to Shell. I have been a resident of South Florida for 26 years, and I am currently building a home in the lower Keys for my retirement, so I have a vested interest in the well being of this area. I love South Florida and the Everglades, and do not want to see the wanton ruination of what is left. Also as a tax payer, I do not appreciate being bullied by government and big business! As one speaker said during the oil drilling hearings in the Keys a few years ago: "Everything man builds eventually leaks." Consider that, if you will, in making your final decision.

Thank you for taking the time to review my thoughts on this subject.

Sincerely,

Mary D. Blackman

Mary D. Blackman



I-22

DISTRICT MANAGER
BUREAU OF LAND MANAGEMENT
411 BRIARWOOD DR. SUITE 404
JACKSON, MISSISSIPPI 39206
Re: OIL WELL DRILLING BY SHELL
IN THE EVERGLADES

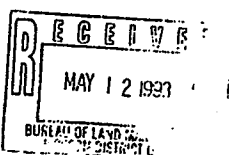
Dear Sir:

I can't believe you would even con-
sider an oil rig in the EVERGLADES!!

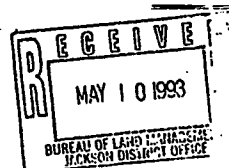
I wish to PROTECT AND BEG YOU
AND SHELL to Reconsider.

NO OIL WELLS IN THE EVERGLADES
NONE- EVER -

A TAXPAYER OF FLORIDA
Esther E. BLANTON
3018 N.E. 23 CT.
FT. LAUDERDALE, FL.
33305



I-23



1967 Sixty Oaks Ln.
Vars Beach, FL 33596.6
May 7, 1993

Dear Sirs;

I support the Shell Oil proposal
to drill on the Miccosukee Indian Reservation
in Broward County. I fully expect Shell
to comply with all environmental
safeguards, as they have historically done.

Very truly yours

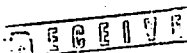
Chris Cook

I-24

Dear Sirs:
ISNT THERE
ENOUGH PROBLEMS
IN THE EVERGLADES
W/ OUT DRILLING FOR
OIL. S. FLA DOES
NOT NEED THIS. PLEASE
DONT RISK THE LAST
OF OUR WETLANDS TO
BE DESTROYED BY
SHELL

Sincerely,

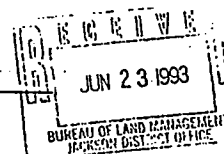
Bratt Boulmay



I-25

MENTAL FLOSS

ECO



Let Shell drill in Hell

By

ADRIAN AUNEN

Talk about outrageous.
With all the predictions about how
much it's going to cost us to clean up the
Everglades and the water wars that could
divide South Florida, Shell Oil Company
still wants to drill in the middle of the
Everglades.

The very idea of poking more holes in
the already ailing system and increasing
risks to wildlife and water supplies is
nothing short of arrogant.

So is Shell's attempt to "greenwash" the
plan by presenting an Environmental
Impact Statement that uses outdated
maps and information. It only skims the
surface of issues such as the effects on
groundwater and future restoration plans.

The proposed drill site is at the edge of
the Big Cypress National Preserve
(located by the Collier/Broward line, north
of Alligator Alley) and the world-
renowned sawgrass marsh, a conservation
area that keeps Broward and Dade
counties from running out of water.

State rules prohibit direct drilling in the
conservation area, so Shell came up with
a way around it - by drilling at an angle.
The drilling rig would be outside the
conservation area, on land owned by the
Miccosukee Indians (read: federal land).
The end of the drill would be 4,700 feet
east - smack dab in the conservation area,
at 18,850 feet down.

Slack.

The drilling rig would stand in a cattle
pasture within 200 feet of a canal and
only 1,000 feet from a pumping station
that funnels water into the Everglades
water catchment areas. Imagine what a
hurricane could do with that setup.

The area is also home to Florida

panthers, wood storks, Everglades kites,
Everglades minks and, in the Shell study's
own incriminating words, "other
waterfowl" (sic).

Shell's tenacity would make you think it
expects to find a pool of oil the size of
Prince William Sound, but even the
experts doubt there's

much to be found. There's

not much oil in Florida,

and the oil that's here is

of such poor quality that

it's hardly worth refining.

Could it be worth losing

the Everglades?

Shell admits that, if it

finds oil, it's likely to seek

more drilling. It also

admits that spills are

inevitable.

Exxon and other firms

drilling nearby have been

unable to prevent spills.

Almost 163,000 gallons of

crude oil and 120,000

gallons of plant-killing

brine already have been

spilled in the Everglades

area. Unchecked, one

gallon of petroleum can

contaminate one million

gallons of drinking water.

That's why about 300

South Floridians, and even

some tourists, crammed a

recent public hearing in

Broward County to talk

with Washington

bureaucrats on the issue.

"Tell Shell to drill in

Hell!" yelled some folks.

Others are cutting up their Shell credit

cards and taking their business elsewhere.

Not a bad idea.

What you can do
Unless something
changes, the U.S.
Department of the Interior
is expected to approve
Shell's plans soon.
Besides cutting up your
Shell card and boycotting
the stations, here's some
folks you can write. Or
just mail them this
column.

Bruce Babbitt
Secretary of the Interior
1849 C Street, NW
Washington, D.C. 20240
(202) 208-7150

Carol Browner
U.S. Environmental
Protection Agency
401 M Street, SW
Washington, D.C. 20460
(202) 260-4700

Robert V. Abbey
District manager of the
Bureau of Land Management
Jackson District Office
411 Briarwood Drive,
Suite 404
Jackson, MS 39203

Jocelyn Boyce
P. O. Box 32831
Palm Beach Gardens FL
33409

I-26

Dear Mr. Abbey,
Please take this threat seriously! Make Shell drill somewhere else! This place is too beautiful to endanger. Water is the life-blood of South Florida - don't let them ruin it for us or our children. I am boycotting Shell (and Chevron) until they change their plans. Please help us to do the right thing.



Printed on Recycled Paper

Sincerely
Paul Brandino

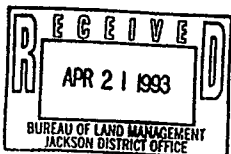
I-27

45 Dear Mr. Abbey - 4/19/93
As much as the Everglades is a unique ecosystem and its beauty affects the water supplies of millions of people and the economic system of South Fla. and it is already in severe distress if it is not that you reject Shell drills here -
26 Furthermore the impact study by Shell is based on outdated maps and erroneous assumptions. Myra C. Brucher

I-28

TO: JACKSON DISTRICT OFFICE
BUREAU OF LAND MANAGEMENT
411 BRIARWOOD DRIVE
SUITE 404
JACKSON, MISS. 39204

FROM: JOY BRIGHT
313 S.W. 13TH ST.
FT. LAUDERDALE, FL. 33315



TO WHOM IT MAY CONCERN:

REMEMBER THE ALASKA DISASTER!

I WAS STUNNED WHEN I READ THE ARTICLE IN THE SUN SENTINEL, THURSDAY, APRIL 15 BY ROBERT MCLURE ABOUT THE PROPOSED OIL DRILLING BY SHELL OIL CO. IN THE EVERGLADES. I AND SEVERAL FRIENDS HAVE NOT USED ANY EXXON PRODUCTS SINCE THE OIL SPILL IN ALASKA. TO ADD SHELL OIL CO. TO THAT LIST SADDENS ME. HAVE PEOPLE NOT YET LEARNED THEIR LESSONS? (I.E. ONE QT. OF OIL CREATES A SLICK ONE ACRE BIG!)

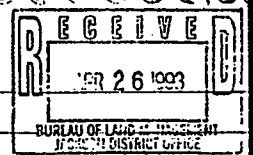
PLEASE LEAVE THIS TOTALLY UNIQUE AREA "OFF LIMITS" TO ANY & ALL PROPOSED PLANS OF THIS NATURE.

YOURS VERY TRULY,
JOY BRIGHT

Joy Bright

I-29

pg. 1
To everyone that this concerns
This letter is in reference to the plans of drilling an oil well in the Everglades. I can't believe this letter has to be written but I feel something has to be done. Each and every person who has children or cares about children should be writing you.
By drilling in a precious natural environment like the Everglades you are showing a complete lack of care for the Earth. Do you want the children of tomorrow to be denied the natural beauty of the Everglades? I don't want to take my daughter out to the Everglades to see where deer and turtles, snakes, plants, etc. used to be. I don't want to give her a tour of oil fields either pumping or abandoned.
I have been a firefighter for 2 years. My job has been to protect and save lives and property. Now it is your turn to save wildlife and property. I've been silent for a lot of years but I



I-34

Elaine Brown
4851 Northwest 26 Court, Apartment 137
Lauderdale Lakes, FL 33313
Home Phone: 305/486-3815

April 19, 1993

United States Dept. of the Interior
Bureau of Land Management
411 Briarwood Drive, Suite 404
Jackson, Ms 39206

Dear Sirs:

Please consider this a protest of your Environmental Impact Statement for the exploratory well, Miccosukee Indian Reservation, Broward County, Florida.

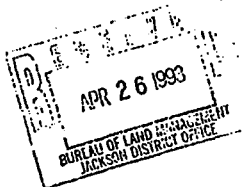
First of all, does Shell Oil Co. really need to drill in the supersensitive Everglades, and near our water supply, and in the middle of the panther trail? Are there any alternatives to where the well should be and, therefore, shouldn't there be a further study? | 9

What type of transportation for the oil is contemplated; is it pipeline, tanker truck, or what? | 21

Why is the Impact Statement lacking in answers for the above questions? Are these answers purposely being avoided? Frankly, I'm happy that I've never purchased Shell Oil Co. products, and I am making sure that my family and friends tear up their Shell credit cards. Of course, I will also avoid giving any trade to the Indians at their businesses.

Sincerely,

Elaine Brown
Elaine Brown



I-35

DRAFT ENVIRONMENTAL IMPACT STATEMENT

APPLICATION FOR PERMIT TO DRILL
AN EXPLORATORY WELL
ON THE
MICCOSUKEE INDIAN RESERVATION

Written comments on the Draft Environmental Statement are being accepted until May 18, 1993. Comments on the analysis and the preferred alternatives are specifically sought. Please provide your name and address. Comments should be sent to:

District Manager
Bureau of Land Management
411 Briarwood Drive, Suite 404
Jackson, Mississippi 39206

Attention: Robert V. Abbey

COMMENTS: *Dear Mr. Abbey;* 4/24/93

As a resident of Florida, I am opposed to any drilling for exploration or fuel production in or near the Everglades. As a previous long-term resident of Oklahoma, I am aware of capped wells & pressure as well as in-ground oil deposits not presently being drawn upon, due to the close cost of oil. The Everglades is a very fragile, environmentally sensitive ecology. It is unique in the world by its ecology & flora & fauna, & its waters are the source of So. Florida's drinking water. I directly & indirectly suggest it's tourism industry.

Mr. Abbey, it is our generation, yours & mine, that will be judged regarding the decisions we make that

I-36

impact our global environment. As long as there are other fuel sources obtainable, (with less potential for environmental harm in its extraction) let us choose to use those, firstly, before putting the Everglades at risk. The decision that is made here will have a reaching impact on policy regarding environmentally threatened lands. You are in a unique & powerful position to lobby as a trustee for our environmental heritage, or cast another vote for greed & short-term gain.

I am deeply concerned about this, & I appreciate your consideration of my view.

Sincerely, *Marion D. Brown*
2111 N.E. 34th St.
Tipton, Ind. 46064

Jackson District Office
Bureau of Land Management
411 Briarwood Drive
Suite 404
Jackson, Mississippi 39206

To whom it may concern:

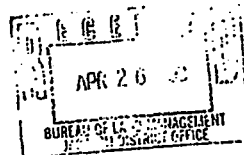
As a south Floridian who values the environmentally sensitive Everglades, I am adamantly opposed to Shell Oil's plans to drill for petroleum there. No number of precautions can assure that contamination will not eventually occur, due either to a natural or human-induced disaster. I urge you to make all efforts to thwart Shell's plans to exploit the Everglades. . . before it is too late for our wildlife, our economy, our water supply, and the preservation of the unique and natural beauty of the Everglades.



Barbara J. Bush
Attorney at Law
117 Barbara Street
Hollywood, FL 33030
(305) 922-0725

Very concerned,

Barbara J. Bush

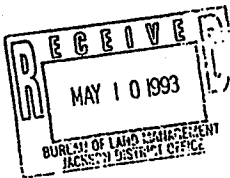


I-37

I-38

Bureau of Land Management
411 Briarwood, Suite 404
Jackson, MS 39206

May 5, 1993



Att: District Manager

Gentlemen:

In my letter of April 1991 I asked you to give consideration to the proposed drilling for petroleum in South Florida, particularly in the Miccosukee Indian Reservation in Broward County.

I still feel you should look favorable on the draft environmental impact statement recently prepared by Dames and Moore Consulting Company. It appears to me any drilling at this location would not negatively affect the adjacent area.

Our dependency on foreign oil is mightily disturbing.

Sincerely,

P. Douglas Burleson
CWO, W-4/R. Douglas Burleson, USNR, Retired
199 Whispering Sands Drive #103
Sarasota, Fl. 34242

I-39

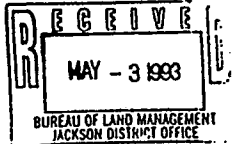
Mr. Abbey,

4/28/93

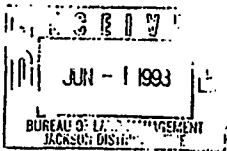
This letter is in regards to the controversy if Shell Oil should be allowed to seek petroleum in Florida. I was at the Public Hearing on April 14 at the Fort Lauderdale Convention Center, and from what I have heard drilling for possible oil does not sound worth the risk. Florida, as you know, have the only Everglades in the world and I don't want to see it destroyed by a money hungry company. Thank you for your time.

Chris B.

Christopher Burroughs



I-40



744 Elm Ave. Apt. 5B
Teaneck, NJ 07666
May 26, 1993

Robert V. Abbey, District Manager
Bureau of Land Management
411 Briarwood Drive, Suite 404
Jackson, MS 39206

Dear Mr. Abbey:

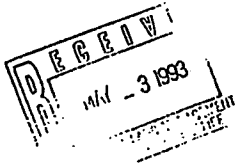
I understand that from now until November you will be deciding whether or not to issue Shell Oil a permit to drill an exploratory well in the Florida everglades. Even though the area is not within Everglades National Park, it is still in the "historic" everglades. Please deny them the permit as this area needs to be protected.

Sincerely,

Rachel Bussel
Rachel Bussel

I-41

Jackson District Office
Bureau of Land Management
411 Briarwood Drive
Suite 404
Jackson, Miss. 39206



To whom it may concern:

It has come to my attention that Shell would like to start oil drilling in the Everglades, and that this issue must be voted on. I urge you to vote against the oil drilling. Not just for the preservation of the Everglades, but for the water that it supplies South Florida.

I live in Unincorporated Fort Lauderdale. This is only 10 miles west from the future drilling site. I also do not have city water, I have well water. This water comes from a water supply under the ground. My fear with the drilling is that it will contaminate my water supply.

45

As a concerned citizen, I ask of you, please when it comes time to vote; vote against the drilling. If not just for the beauty of the Everglades, for the people that benefits from her water supply.

Respectfully yours,

The Cannon Family

I-42

To THE MEMBERS OF CONGRESS
SPECIFICALLY THE BUREAU OF LAND
MANAGEMENT FOR WE CITIZENS OF THE
UNITED STATES OF AMERICA:

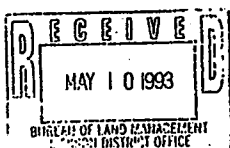
REGARDING SHELL OIL COMPANIES PLANS
TO DRILL FOR OIL IN THE EVERGLADES.
I BELIEVE MUCH TOO MUCH DAMAGE HAS
BEEN DONE ALREADY TO GOD'S CREATION
AND HIS BALANCE OF NATURE - CERTAINLY
THIS IS TRUE AND HAS BEEN TRUE IN
THE EVERGLADES AS WELL AS OTHER
SURVIVAL IMPORTANT OTHER PARTS
OF OUR COUNTRY AS WELL AS THE
WORLD. THERE IS A DEFINITE NEED FOR
"WEAK SISTERS" TO RULE NO MORE -
THOSE WHO ARE INTIMIDATED AND AFRAID
TO SAYING "NO" DAB & BUSINESS POWER
HUNGRY, MONEY HUNGRY DRIVEN WORLD.
NEEDLESS TO SAY IN NO WAY DO I BELIEVE
SHELL OR ANYONE ELSE SHOULD BE ALLOWED TO
DRILL IN THE EVERGLADES EVER.
SHEELEY DRIVE
LOVES PARK III G1111 Samuel L. Cannon

I-43

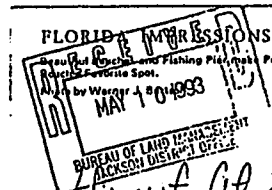
Dear Sir,

I am writing to you concerning the drilling of oil in the Everglades. I feel that this process would disturb the environment in ways such as disturbing the homes of the animals that may become extinct. Therefore I'm totally against the drilling of oil for environmental reasons.

Sincerely,
Gracy Carlson



I-44



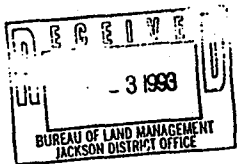
Do not let Shell Oil
drill in our Everglades!

Heathly Camody

D. H. Camody
8840 Royal Palm Blvd. Apt. 101
Coral Springs, FL 33065

Jackson Dist. Office
Bureau of Land
Management
411 Briarwood Dr.
Suite 404
Jackson, Miss.
39206

I-45



DEAR MR. ABBEY,

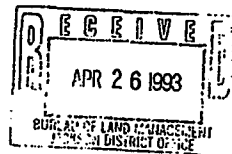
I DO NOT WANT THE BUREAU OF LAND MANAGEMENT TO LET SHELL OIL DRILL IN THE EVERGLADES.

WE WERE ABLE TO KEEP OFF SHORE DRILLING FROM OUR COAST - NOW LETS KEEP OIL COMPANIES OUT OF THE EVER GLADES.

THANK YOU

Martha E. Carroll

I-46



April 20, 1993

UNITED STATES DEPARTMENT OF THE INTERIOR
Bureau of Land Management
411 BRIARWOOD DRIVE, Suite 404
Jackson, Mississippi, 39206
ATTENTION: Mr. Robert Abbey, District Manager.

RE: Application for permit to drill an exploratory well on the MICCOSUKEE INDIAN RESERVATION....

Dear Mr. Abbey,

I have continuously lived in BROWARD COUNTY, FORT LAUDERDALE, FLORIDA, for a number of years, and in the ensuing process, have seen an alarming number of changes brought about in the name of progress.....THE FOLLOWING:

a. The expansion and encroachment of land in the Western part of Broward County as well as Palm Beach and Dade Counties, namely, whats happening to the Everglades, the nations most fragile National Park.....

b. A complete lack of interest and lack of knowledge concerning the environmental problems, which have resulted FROM this progress....on the Local, State, Federal levels.

c. The problem of our Water Resources, which I understand, is in danger of contamination from toxic groundwater runoff.....

d. The problem of transporting the oil, if found at the well site.....

21 1. I understand there are several pipelines from the Raccoon Point site in Big Cypress, to Port Everglades, and there have been at least 33 leak points in these pipes....

2. Will the Miccosoukee site oil if found be joined to this pipe line and if so can these pipes carry new capacity or is the pipeline to be expanded

In reference, to the water problem, the Regional Map, figure 1-1 shows at least three water conservation areas that will be involved, and according to table 4-2 ... water resources accidental contamination could affect the water.....these tables and maps are in the Summary Draft Impact Statement, dated

I-47

March 8th, 1993.....

The Biscayne Aquifer, as you know is very fragile and is the main water supply for Southeast Florida, and below that is another Aquifer with highly mineralized water, which if we had to use it would involve desalination plants.....

The above situation is very disturbing.....

I am all for PROGRESS. I am all for the MICCOSUKEES profiting from this project they need all the help they can get.....I am surprised that they would compromise their surrounding in such a way that it may in the future become inhabitable due to the Everglades disappearing...or the water problem.....

It is very easy for outside parties to come to our State and make Judgement - you dont have to live and you dont have to bring children up here....they are the future.....

Please think very hard and long at the overall problem of the water resources problem, the transportation of the oil, if found and please the overall problem of the environment in this great State.....

Yours truly,

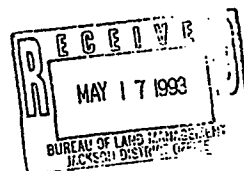
Joan K. Carroll
JOAN K. CARROLL
P.O. BOX 030224
FORT LAUDERDALE, FLORIDA.
33303-0224

I WOULD APPRECIATE HEARING FROM YOU AND YOUR THOUGHTS ABOUT THIS PROBLEM...

I-48

May 12, 1993

Bureau of Land Management
411 Briarwood
Suite 404
Jackson, Ms. 39206



Gentlemen/Ladies,

This is to advise that I fully support the conclusions of the Draft Environmental Impact Statement (DEIS) prepared by Demarest Moore Consulting Company in Boca Raton, Florida on behalf of Shell Oil Company in connection with their proposal to drill a well in South Florida on the Miccosukee Indian Reservation in western Broward County.

Sincerely
Leslie B. Case Jr.
512 Navy Cove Blvd.
Gulf Breeze, Fl. 32561

I-49

I-50

7/10/93
Dear Mr. Abbey,
I understand that from now until November you will be deciding whether or not to issue Shell Oil a permit to drill an exploratory well in the Florida Everglades. Even though the area is not within Everglades National Park, it is still in the "historic" everglades. Please deny the permit!
Yours truly,
S. Chisen

RECEIVED
JUL 10 1993

Dear Mr. Abbey,
My family and I understand that from now until November you will be deciding whether or not to issue Shell Oil a permit to drill an exploratory well in the Florida Everglades. Even though the area is not within Everglades National Park, it is still in the "historic" everglades. Please deny the permit.
Sincerely,
Julia Chretien
JULIA CHRETIEN

I-51

I-52

Jackson District Office
Bureau of Land Management
411 Briarwood Drive
Suite 404
Jackson, Mississippi 39206

To whom it may concern:

As a south Floridian who values the environmentally sensitive Everglades, I am adamantly opposed to Shell Oil's plans to drill for petroleum there. No number of precautions can assure that contamination will not eventually occur, due either to a natural or human-induced disaster. I urge you to make all efforts to thwart Shell's plans to exploit the Everglades. . . before it is too late for our wildlife, our economy, our water supply, and the preservation of the unique and natural beauty of the Everglades.

Very Concerned,

Richard Chung

RECEIVED
JUN 28 1993

Ruth H. Clark
1120 Seminole Dr. No. 4
Fort Lauderdale, FL 33304

May 15 1993
RECEIVED
MAY 17 1993

Mr. Bruce Babbitt, U.S. Dept. of Interior
c/o Robert V. Abbey, Bureau of Land Management
411 Briarwood Drive, Suite 404
Jackson, Mississippi 39206

Re: Draft D.E.I.S. for Shell Western E & P Inc. Miccosukee 3-1 Well

Dear Sir,

I have been independently involved in the study of wetland and water resource and land use issues in Broward County for over ten years.

I implore this administration not to approve drilling even an exploratory oil well under the Water Conservation Area of the Everglades where the World Heritage ecosystems are already severely depleted by the cumulative impacts of human activities.

The draft DEIS of Mar. 8, 1993 is based upon inadequate and obsolete 1972 information. Since the draft was started the South Florida Water Management District and the U.S. Corps of Engineers have recognized that the Central & South Florida Flood Control Project needs revision and that physical structures such as canals and pumping stations must be restructured to retain water that is currently going to the wrong places and to increase sheetflow to Everglades National Park and to Florida Bay to try to restore ecological integrity.

I hope to see a complete Sole Source review of this project by The U.S.E.P.A. and an extended period of comment after the DEIS has been redrafted to take into consideration the omissions that were pointed out at the Ft. Lauderdale public hearing April 14, 1993.

Yours very truly,
Ruth H. Clark
Ruth H. Clark

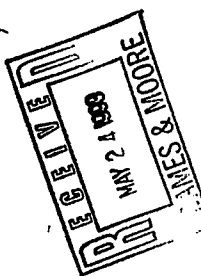
I-53

N. Montgomery Clarke
1717 Homewood Boulevard
Delray Beach, Florida 33445
May 15 1993
Bureau of Land Management
411 Briarwood Drive, Suite 404
Jackson, MS 39206

In regard to Shell Oil Co's proposal to drill a well on the Miccosukee Indian Reservation, I urge you to pass legislation in support of this request. I do not feel that the drilling of such a well will interfere with the protection of natural resources + environmental quality, and our country is desperately in need of new domestic oil reserves to fight dependence on outside supplies of crude oil.

I trust you will support Shell Oil Co's proposal. This is my second request to you
Yours truly,

N. Montgomery Clarke



I-54

OFFICE
JACKSON DIST. MGMT
BUREAU OF LAND

Dear Sirs, (MR. ROBERT ABBEY), 4/15/93

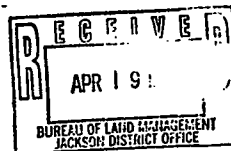
The plan to allow Shell oil to drill for oil in a water conservation and environmentally sensitive area is absolutely insane. The Everglades is a precious resource that provides recreation for millions of visitors each year. Water is the most precious resource in South Florida and to even entertain for one minute a plan that could jeopardize that supply is unbelievable to me.

Mr. Abbey, I hope the words "Land Management" have some real meaning for you. Shell Oil has enough places in the world to explore and drill for oil. They don't need to come into our unique Everglades area to disrupt this jewel of a natural resource.

Please do everything in your power to stop this unnecessary, greedy exploration. America needs the Everglades and South Florida needs uncontaminated aquifers.

Yours sincerely,

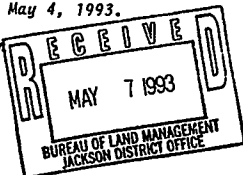
Santo J. Coco
2501 W GOLF BLVD
APT # 235
POMPANO BEACH, FL
33064



I-55

United States Department of the Interior
Bureau of Land Management
411 Briarwood Drive, Suite 404
Jackson, Mississippi 39206
District Manager; Bert Rodgers

2123 Maui Drive
Holiday, FL 34691
May 4, 1993.



Dear Mr. Rodgers,

I will try to make this very short and sweet. It is my understanding that the well that Shell Oil has proposed to drill in western Broward County on the Miccosukee Indian Reservation is still being held up by our slow moving government. It is also my understanding that any money produced will go to the Miccosukee Tribe. I think that we have taken enough away from the American Indian, so as for my outlook as a resident of Florida, I should hope that not too much time is wasted, that if it is alright with the land owners (The Miccosukee Tribe) not the Bureau of Land Management, or the Bureau of Indian Affairs, just the Tribe itself and Shell Oil, lets let them get on with it so the the owners can make a little money before they die from old age waiting for the Government that took away most of their land, grants them permission to do the business that they desire with Shell Oil. It is also my understanding that with the safe guards recommended, that it will be safe. Thank you for the time you spent reading my letter.

Respectfully,

Randolph L. Compton
Randolph L. Compton
2123 Maui Drive
Holiday, Florida 34691

I-56

April 27, 1993

Mr. Robert Abbey
District Manager
United States Dept. of the Interior
Bureau of Land Management
411 Briarwood Drive, Suite 404
Jackson, Mississippi 39206

Dear Mr. Abbey:

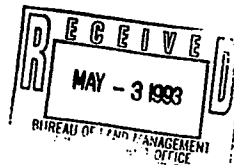
I attended the meeting at Port Everglades relative to Shell Oil putting down an exploratory well on the Miccosukee Indian Reservation in Broward County, Florida --- i.e. The Everglades.

I listened carefully to all who presented their views and was not only disturbed by what I heard but by the Environmental Impact Statement put out relative to this exploratory well. I am a long time resident of Florida and have seen great changes, most of them not thought out very well because of lax laws, greed or just plain ignorance. In this day and age, ignorance is no longer an excuse. But greed and lax laws seem to always take precedence. Anyone familiar with oil drilling knows that the well itself does little damage but everything else to do with it does a great deal of damage and other than economics for a very short time span, there is the "overall impact" on the ecosystem. I don't need to go into detail, you have heard all the arguments.

25 I am writing specifically to ask you to get better and later maps of the
26 area affected, take into consideration that fact that "getting the flow
8 of the Everglades back to normal to help save Florida Bay" was not in any way considered, and don't try to pretend that the Biscayne Aquifer won't be harmed. Please take a look at the NO ACTION ALTERNATIVE.

Respectfully,

Suzanne Conner
Suzanne Conner
3777 N.W. 78th Avenue
#4-H
Hollywood, Florida 33024



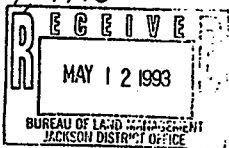
I-57

I-58

Coral Springs resident
wants to save Everglades

The greed mongers are at it again. Shell Oil wants to drill for oil in the Everglades. Is there no end to the madness? People of Florida, speak up. Send your protests to: Bureau of Land Management, Jackson District Office, 411 Briarwood Drive, Suite 404, Jackson, Miss. 39206. The deadline for comments is May 18. Take five minutes and send a postcard to save our Everglades from the drillers. Dorothy Carmody, Coral Springs

Po Box 770794
Coral Springs, FL 33077
May 9 1993



ATTENTION: DISTRICT COMMISSIONER

ENCLOSED YOU'LL FIND A COPY OF A LETTER, WRITTEN TO THE CORAL SPRINGS FORUM, A WEEKLY NEWSPAPER, LOCATED IN THE POPULOUS SOUTH FLORIDA AREA.

THERE IS ONLY ONE "EVERGLADES". DOROTHY CARMODY IS RIGHT. THE ARMY CORPS OF ENGINEERS AND THE WATER MANAGEMENT DISTRICTS, FINALLY, HAVE "GOT IT RIGHT." NOW, WE NEED THE BUREAU TO KNOW WHAT WE KNOW. SAY NO TO EXPLORATORY DRILLING. THANK YOU.



Dorothy Carmody

Apr 17, 1993

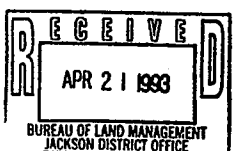
Jackson District of
Jackson, Miss
Gentlemen -

I am very much against
Shell planning to drill for oil
in the Everglades.

Please save our Everglades.

So important

Sincerely,
Jane Copenhagen
1900 S. Ocean Dr
A 303
St. Landress
28 33316



I-59

I-60

Boies Coppinger
910 Contento Street
Sarasota, Florida 34242

May 8, 1993

Mr. Robert V. Abbey, Dist. Mgr.
Bureau of Land Management
411 Briarwood Dr., #404
Jackson, MS 39206

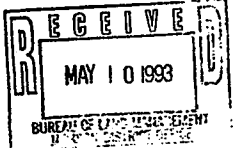
Dear Mr. Abbey:

Thank you for the promptness with which I received my copy of the Summary of the DEIS for Miccosukee 3-1 Exploratory Well. I write today in support of the findings in that Statement.

I am a Floridian concerned about my state's physical well-being but more, I am an American with even greater concerns about our country's continued dependence on foreign oil. This poses monumental risks to both our national security and our economy. In the absence of any long-range Federal energy policy to the contrary, we must continue to develop our resources where we believe them to be.

Very truly yours,

B. Coppinger, Jr.



DON'T LET SHELL OIL DRILL!

April 19, 1993

Mr. Robert Abbey
Jackson District Office
U. S. Bureau of Land Management
411 Briarwood Drive
Suite 404
Jackson, MS 39206

Gentlemen:

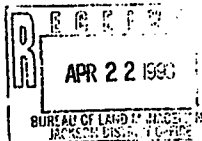
Native Americans have a saying that they are the "caretakers" of Mother Earth and their philosophy is that it is mankind's responsibility to take care of the earth and her creatures for the next seven (7) generations.

It should be the Land Management's responsibility to protect the Everglades for generations yet unborn. If the Everglades was a patient, doctors would say it is already in critical condition. There is a delicate balance in the environment of the Everglades and MAN'S callousness, ignorance, greed and abuse are guaranteed to tip the scales. WHAT WILL SHELL OIL DO WHEN THEY ARE SITTING ON TOP OF A DEAD PLANET?

Men come and go. Mother Nature survives. Leave the Everglades alone, Mother Nature knows what she's doing.

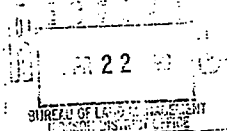
Sincerely,

Donald L. Cosby



I-61

DON'T LET SHELL OIL DRILL!



April 19, 1993

Mr. Robert Abbey
Jackson District Office
U. S. Bureau of Land Management
411 Briarwood Drive
Suite 404
Jackson, MS 39206

Gentlemen:

Native Americans have a saying that they are the "caretakers" of Mother Earth and their philosophy is that it is mankind's responsibility to take care of the earth and her creatures for the next seven (7) generations.

It should be the Land Management's responsibility to protect the Everglades for generations yet unborn. If the Everglades was a patient, doctors would say it is already in critical condition. There is a delicate balance in the environment of the Everglades and MAN'S callousness, ignorance, greed and abuse are guaranteed to tip the scales. **WHAT WILL SHELL OIL DO WHEN THEY ARE SITTING ON TOP OF A DEAD PLANET?**

Men come and go. Mother Nature survives. Leave the Everglades alone, Mother Nature knows what she's doing.

Sincerely,

Jan Cosby

I-62

Bureau of Land Management
MAY 17 1993
Richard & Muriel Covington
1191 - 77 Ave. N.
St. Petersburg, FL 33702-5155

Dear Mr. Abbey
Is it really possible that an oil company will be allowed to drill in the Everglades?

Do you realize that the Everglades is a unique system found nowhere else in the world?

26 I have been told that the information
85 used by Shell is out dated. This would mean that the impact statement is incorrect.

The Everglades should be declared an endangered species and protected from any more of man's interruption.

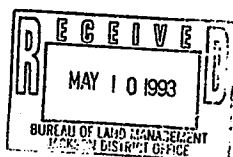
Please say "NO" to Shell Oil Co.

We don't inherit the earth
from our ancestors.
We borrow it from
our children.

Thank you
Muriel L. Covington

I-63

2530 N.E. 35 Street
Lighthouse Point, FL 33064
May 6, 1993



Jackson District Office
Bureau of Land Management
411 Briarwood Drive
Suite 404
Jackson, Miss 39206

Gentlemen,

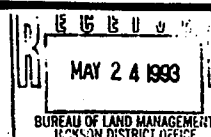
I am writing this letter on behalf of myself and my husband to express our concern over your proposed oil drilling in the everglades. The damage that could occur far outweighs any benefit that would be gained.

Please discontinue your plans to destroy this "last frontier". Lets leave something of this earth for future generations.

Sincerely,

Dorothy A. Cowdrey
Dorothy A. Cowdrey

I-64



May 12, 1993

Bureau of Land Management
411 Briarwood
Jackson, Mississippi 39206 Suite 404

Dear Sirs,

This letter is to ask that you give favorable consideration for Shell Oil Company to drill a well in South Florida on the Miccosukee Indian Reservation in western Broward County.

As you know, a draft environmental impact statement has been prepared for your office. The impact statement indicated that while there may be some short-term disturbance to the environment, these conditions can be managed.

The American Petroleum Industry has a good record in protecting the environment while producing the much need petroleum products for our country.

Needless to say, this project will help the Miccosukee Indians and their Reservation.

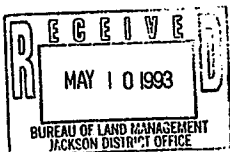
Very truly yours,

Timothy A. Crain
Timothy A. Crain
P.O. Box 27277
Panama City, FL 32411

CC: Senator Bob Graham
Senator Connie Mack
Representative Earl Hutto

I-65

John G. Croes
1045 NW 143 St.
Miami, FL 33168



May 5, 1993

Bureau of Land Management
411 Briarwood, Suite 404
Jackson, MS 39206

Dear Sirs:

I understand your office is soliciting comments from the public regarding a proposal by Shell Oil Company to drill an exploratory well on the Miccosukee Indian Reservation in western Broward County.

From a study of the draft environmental statement it is apparent that the proposed action is in compliance with applicable regulations and assures protection of natural resources and environmental quality.

I therefore support the findings in the draft environmental impact statement on Shell's drilling plans.

Sincerely,

John Croes

I-66

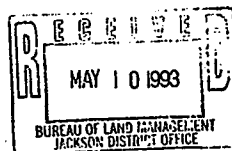
May 7, 1993

Gentlemen,

According to news reports, I understand that Shell Oil Co. has asked for permission to drill for oil on the Miccosukee Indian Reservation in South Florida. I believe that any danger to the environment is very small and therefore they should be allowed to drill a well.

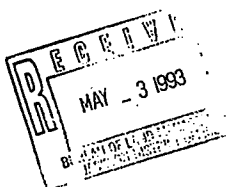
I am very concerned about our dependence on foreign oil and believe that we should drill for oil whenever the proper precautions are taken to protect the environment.

Yours truly,
Paul H. Croes



I-67

Jackson District Office
Bureau of Land Management
411 Briarwood Drive
Suite 404
Jackson, Miss. 39206



To whom it may concern:

It has come to my attention that Shell would like to start oil drilling in the Everglades, and that this issue must be voted on. I urge you to vote against the oil drilling. Not just for the preservation of the Everglades, but for the water that it supplies South Florida...

I live in Unincorporated Fort Lauderdale. This is only 10 miles west from the future drilling site. I also do not have city water, I have well water. This water comes from a water supply under the ground. My fear with the drilling is that it will contaminate my water supply.

As a concerned citizen, I ask of you, please when it comes time to vote; vote against the drilling. If not just for the beauty of the Everglades, for the people that benefit from her water supply.

Respectfully yours,

The Cullis Family

45

I-68

DRAFT ENVIRONMENTAL IMPACT STATEMENT

APPLICATION FOR PERMIT TO DRILL
AN EXPLORATORY WELL
ON THE
MICCOSUKEE INDIAN RESERVATION

Written comments on the Draft Environmental Statement are being accepted until May 18, 1993. Comments on the analysis and the preferred alternatives are specifically sought. Please provide your name and address. Comments should be sent to:

District Manager
Bureau of Land Management
411 Briarwood Drive, Suite 404
Jackson, Mississippi 39206

Attention: Robert V. Abbey

COMMENTS: Help My Name is Angelo V. D'Alessandro
I'm A Resident of Hollywood, FL and
I'm 16 years old.
I'd like to start by thanking
you for helping me find out that
I want to become an Environmental
lawyer to help stop things like this
from happening. I might just be a
minor, I might not be able to legally
do a lot of things, but I'm not blind
to the fact of what is expressed
in this Draft Statement is wrong,
an accident waiting to happen.
I believe that the chances of
finding oil is a lot less than the
chances of a environmental catastrophe
happening. And it's one of the most

I-69

Fragile ecosystems in the USA
the chances of everything fixing it
self is the chance of Figs learning
How to Fly.

I would like to to end this
with If you just listen to all
of us we have valid concrete
reasoning Be kind of feelings
and I think that there is doubt
(may be small but its there)
in all your minds, please expand
to your minds as see
the danger and terror that
is in our hearts. THANK

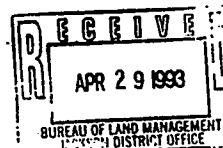
you
Angelo V. DiMassimo

2547 Wilson St.
Hwy, FL 33020

P.S. I'd like for the everglades to
be more than a legend for my
kids.

DiMassimo

I-70



Jackson District Office
Bureau of Land Management
411 Briarwood Drive
Suite 404
Jackson, Mississippi 39206

To whom it may concern:

As a south Floridian who values the environmentally sensitive
Everglades, I am adamantly opposed to Shell Oil's plans to drill
for petroleum there. No number of precautions can assure that
contamination will not eventually occur, due either to a natural or
human-induced disaster. I urge you to make all efforts to thwart
Shell's plans to exploit the Everglades. . . before it is too late
for our wildlife, our economy, our water supply, and the
preservation of the unique and natural beauty of the Everglades.

Very Concerned,

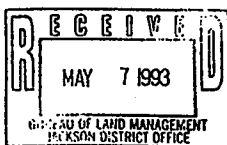
Scott Dool

Mr. & Mrs. Scott Dool
817 NW 100th Way
Coral Springs, FL 33071

I-71

Fred J. Davies
3100 Timber Lake Drive
Pawcatuck, CT 06259
May 3, 1993

Bureau of Land Management
411 Briarwood, Suite 404
Jackson, MS 39206



Gentlemen;

I am writing to support Shell oil Company's
proposal to drill a well in South Florida on the
Miccosukee Indian Reservation in Collier
County -

The draft environmental impact
statement, as prepared by Davies & Moore Consulting Co.,
comes to the proper conclusion. The DEIS
states that drilling of the proposed exploratory
well would cause some short-term disturbance
to components of the human and natural environment,
but would not have significant impacts on water,
air, vegetation, wetlands, or wildlife.

For these reasons, I feel Shell oil's
application to drill should be approved.

Very truly yours,
Fred J. Davies

I-72

DEAR MR. ABBEY,

15 APRIL 93

AFTER ATTENDING LAST NIGHTS PUBLIC
HEARING ON SHELL WESTERN E&P INC'S PROPOSED
DRILLING IN THE EVERGLADES, I AM COMPELLED
TO STATE MY OPPOSITION TO THIS OR ANY
INVASION INTO THIS FRAGILE ECOSYSTEM.

AS I'M SURE YOU ARE NOW AWARE THE
ENVIRONMENTAL IMPACT STATEMENT, PREPARED BY
DANES & MOORE OF BOCA RATON, FLA HAS GROSSLY
UNDERESTIMATED THE DAMAGE PROPOSED TO THE

26 AREA, OUR WATER SUPPLY AND THE ENDANGERED
85 WILDLIFE. MAPS AND DATA USED IN THE E.I.S.
ARE 20 YEARS OUT OF DATE!

PLEASE HELP US STOP ANY FURTHER
DESTRUCTION OF THIS PRECIOUS SANCTUARY.

YOURS TRULY,
DON R. ELDERKIN
(305) 583-1854
DON R. ELDERKIN
1931 S.W. 37th AVENUE
FT. LAUDERDALE, FLA 33312

Dear Mr. Abbey,

As can only be attested what my friends
have written. You are well aware of the
shoddy proposal offered on behalf of Shell oil.
It's a frightening thought that you would even
think of approving such a poorly thought out
plan. I implore you not to approve this proposal
SAVE OUR EVERGLADES It is the only one that
we have

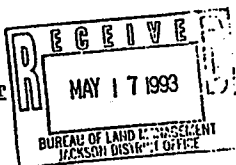
A frightened citizen
Kelley Ann Lewis

I-73

I-74

DRAFT ENVIRONMENTAL IMPACT STATEMENT

APPLICATION FOR PERMIT TO DRILL
AN EXPLORATORY WELL
ON THE
MICCOSUKEE INDIAN RESERVATION



Written comments on the Draft Environmental Statement are being accepted until May 18, 1993. Comments on the analysis and the preferred alternatives are specifically sought. Please provide your name and address. Comments should be sent to:

District Manager
Bureau of Land Management
411 Briarwood Drive, Suite 404
Jackson, Mississippi 39206

Attention: Robert V. Abbey

COMMENTS:

My comments do not pertain directly to the EIS's, but speak to the issuance of a permit to an organization which has an unsatisfactory environmental track record in Florida. Shell Oil Company is the second largest petroleum marketer in the state of Florida (behind Amoco Oil Company). Shell has approximately 200 stations in the state of Florida, almost 100 in Dade & Broward Counties. The Florida Sunshine act allows for evaluation of any contamination problems Shell Oil may have caused @ their facilities. The Bureau of Land Mgmt.

Should realize that Shell Oil Company has caused significant contamination to the soils and groundwater of Florida @ almost every one of their facilities in Florida. Over 90% of Shell sites in Dade and Broward Counties have environmental problems. These accusations can be easily verified by calling the Dade Co. office of DERM or the Broward Co. office of ORRP and speaking to the underground storage tank personnel.

It is difficult for me to understand why the BLM would issue a permit to an organization which has so hideous of an environmental track record, in the very vicinity of the area where the permit is being requested. Please take the time and complete a due diligence review of Shell's local (S.F.L.) environmental record. The BLM will find that whenever Shell Oil goes, environmental degradation is sure to follow. Our Everglades does not deserve to be compromised for the financial benefit of Shell Oil; a Dutch company headquartered in Houston, Texas.

Timothy Day
1301 Bayview Dr #6

Timothy Day

I-75

I-76

Wesley H. Day
Vicar's Landing, Box F-310
Ponte Vedra Beach, Florida 32082

May 4, 1993

Bureau of Land Management,
411 Briarwood, Suite 404,
Jackson, Ms 39206

Gentlemen,

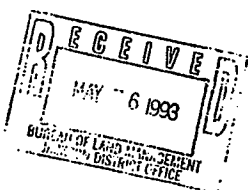
I am writing to you in reference to Shell's proposal to drill a well on the Miccosukee Indian Reservation in western Broward County of Florida.

Considering the very limited environmental effects and the need to increase petroleum reserves within the United States, we sincerely hope that you will give this proposal your approval.

Very truly yours,

Wesley H. Day

Wesley H. Day



Please DENY Shell Oil a permit to drill in our Everglades!

May 1, 1993

Nada DeGastano

Mrs. Nada DeGastano
10815 Hachita Drive
Fort Richey FL 34868



I-77

I-78

23

May 15, 1993

DON'T LET SHELL OIL DRILL!

April 19, 1993

Mr. Robert Abbey
Jackson District Office
U. S. Bureau of Land Management
411 Briarwood Drive
Suite 404
Jackson, MS 39206

Gentlemen:

Native Americans have a saying that they are the "caretakers" of Mother Earth and their philosophy is that it is mankind's responsibility to take care of the earth and her creatures for the next seven (7) generations.

It should be the Land Management's responsibility to protect the Everglades for generations yet unborn. If the Everglades was a patient, doctors would say it is already in critical condition. There is a delicate balance in the environment of the Everglades and MAN'S callousness, ignorance, greed and abuse are guaranteed to tip the scales. **WHAT WILL SHELL OIL DO WHEN THEY ARE SITTING ON TOP OF A DEAD PLANET?**

Men come and go. Mother Nature survives. Leave the Everglades alone, Mother Nature knows what she's doing.

Sincerely,

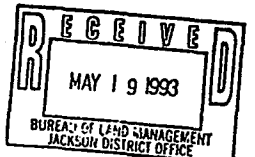
Florie DeGraff

1422 S.E. 12TH ST.

FORT LAUDERDALE, FL. 33316

PLEASE STOP THE DRILLING !!!!!!!

Help us save our valuable wildlife and preserve and wonderful treasure such as the Everglades. There is only one Everglades in the world help us to preserve it so that we can show our future generations them, instead of having to say "There used to be a wonderful place called the Everglades..."



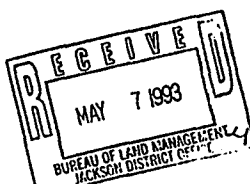
Save The Treasure,

Susan Deifallah

Susan Deifallah
1180 NW 123rd St
Pembroke Pines, FL 33024

I-79

I-80



To whom it may concern:

I am a student at Broward Community College and I am against drilling in the Everglades. My concerns include the effects on the Dade County aquifer and how they will transport the oil if there is any. I also feel the environmental impact statement is incomplete. Please address these and other concerns to the public before a final decision is made.

31

21

Yours truly,

Jeff Delgado

APRIL 10, 1993
LUIZ A. DE PAULA SANTOS
3814 NW 95 WAY
SUNRISE, FL. 33351

BUREAU OF LAND MANAGEMENT
411 BRIARWOOD, SUITE 404
JACKSON, MS 39206

DEAR SIR

I AM WRITING TO YOU AND BLM IN SUPPORT TO A PROPOSAL BY SHELL TO DRILL A WELL IN SOUTH FLORIDA ON THE MICCOSUKEE INDIAN RESERVATION IN WESTERN BROWARD COUNTY.

RESEARCH INDICATES THAT GROUNDWATER VELOCITIES IN ALL OF THE AQUIFERS ARE EXTREMELY SLOW, WHICH WOULD ALLOW ANY GROUNDWATER CONTAMINATION TO BE EFFECTIVELY CLEANED UP, IN THE VERY UNLIKELY EVENT THAT IT SHOULD OCCUR.

THOSE OPPOSING THE DEVELOPMENT AND GROWTH OF OUR NATURAL ENERGY RESOURCES ARE ULTIMATELY AGAINST A MARKET ECONOMY, THE RIGHT TO PRIVATE PROPERTY AND THE CONTINUITY OF OUR COUNTRY AS A SUPERPOWER IN THE WORLD.

ACCORDING TO MARXISM, MAN IS SIMPLY A MANIFESTATION OF MATTER IN A STATE OF EVOLUTION. GIVING CONTINUITY TO THIS MARXIST CONCEPT, ECOLOGY SEES MAN AS MERE LINK IN THE ECOLOGICAL CHAIN. HE IS A LINK JUST LIKE A COW, A PLANT AND A PILE OF MANURE ARE, AND THEREFORE NO MORE THAN THEY.

IN THE CHRISTIAN VISION OF THINGS, MAN POSSESSES AN IMMORTAL SPIRITUAL SOUL THAT PLACES HIM ABOVE ALL BEINGS OF NATURE. HE OCCUPIES A MONARCHICAL POSITION IN THE ORDER OF THE MATERIAL CREATION "BECAUSE MAN WAS MADE IN THE IMAGE OF GOD" (GEN. 9:6) AND RECEIVED AN UNEQUIVOCAL DIVINE COMMAND THAT MAKES HIM KING OF CREATION: "FILL THE EARTH AND SUBDUCE IT" (GEN. 1:28).

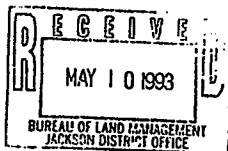
THE CREATOR ESTABLISHED A HIERARCHY AMONG THE MATERIAL CREATURES (MEN, ANIMALS, PLANTS AND MINERALS), GIVING MAN DOMINION OVER CREATION, FOR HIM TO DISPOSE OF IT ACCORDING TO HIS NEEDS IN HARMONY WITH DIVINE LAW AND NATURAL LAW. BECAUSE OF THIS, MAN MAY AND SHOULD RAISE ANIMALS, CULTIVATE THE FIELDS, DEVELOP THE LAND, FOUND CITIES, OPEN ROADS AND BUILT CIVILIZATIONS.

YES, I SUPPORT THE FINDINGS IN THE DRAFT ENVIRONMENTAL IMPACT STATEMENT ON SHELL'S DRILLING PLANS ON THE MICCOSUKEE INDIAN RESERVATION.

SINCERELY,
Luis A. de Paula Santos
LUIZ ANTONIO DE PAULA SANTOS



I-81



Dear Sir:

I am opposed to any oil drilling
or research or exploratory drilling
in my Everglades!

Upset Resident,

A. De Rosa

AUDREY E. DE ROSA
2124 Southeast 18th Street
Ft. Lauderdale, FL 33316

If you commence this
operation I will do everything to
oppose Shell oil.

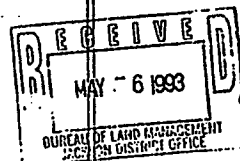
I-82

May 3, 1993

Bureau of Land Management:

Sirs:

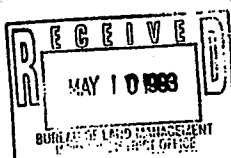
Would you please consider
the favorable report (DEIS)
of Dames & Moore when making
your decision concerning the
proposed well field on the
Miccosukee Indian Reservation?



Thank you,

Fred A. Dickmeyer

I-83



A.L. Diehl
5538 S.W. 88th ct.
Gainesville, FL 32608

May 5, 1993

Bureau of Land Management
411 Briarwood, Suite 404
Jackson, MS 39206

Proposal by Shell Oil
to Drill a Well in South
Florida

As a resident of Florida I have a keen interest in protecting
the total environment of the State and have followed the
discussions about this proposed drilling. Most of the opponents
I have heard on television are completely irrational, while
the proponents present well thought out, straightforward
arguments in favor of the proposed drilling.

I am aware that a draft environmental impact statement (DEIS)
has been prepared and I understand that it supports the proposed
drilling in general. It probably would, indeed, have some short-
term disturbance to components of the human and natural
environments. So did Hurricane Andrew. From my own experience,
I would agree that long-term impacts are not likely, however.

I understand that it is the opinion of the BLM, in consultation
with the Bureau of Indian Affairs, that the analysis presented
in the DEIS supports the proposal with some recommended
mitigation.

The Shell Oil Co. is a highly responsible operator and there
is no doubt in my mind that they will conduct the drilling with
the utmost regard for the environment.

Please register my whole-hearted support for the conclusions
of the DEIS and for the proposed drilling.

Sincerely,
A.L. Diehl
A.L. Diehl

I-84

JOHN P. DINKEL
5641 S.W. 4 ST
PLANTATION FL
33317

May 5, 1993

BUREAU OF LAND MANAGEMENT
411 Briarwood, Suite 404
Jackson, MS 39206

Dear Sirs:

This letter is in reference to to the proposal for Shell Oil Company to drill
an exploratory well on the Miccosukee reservation in Western Broward county of
Florida.

I have read the DEIS that was prepared for your study and consideration. I
find that in my opinion, such drilling would have minimal effects, and no long
term effects or impact on the water, wetlands air or wildlife of the area. I
realize there will be some short term impact on the environment, but feel confident
that Shell, and the Miccosukee tribal leadership, will do everything in their
power to minimize any effects this drilling might have.

I am very familiar with the area involved, as well as with the needs of the
Miccosukee Indians. The drill site proposed is very well protected, by roadways
and levees. Should a spill occur, it would be easily contained.

While many voice strong concerns about groundwater pollution potentials, it is
common knowledge that the movement of groundwater in this area is very slow, and
that recovery of spilled products could be accomplished rather easily with present
day, simple technology. Since adjacent areas are already producing petroleum,
and have been for many years, there is little indication that this site would
cause any hardship to, or impact any species of wildlife.

Finally, the strongest justification for this effort is the probability that it
will prove to be a financial boon to the Miccosukee Indiana tribe. These people
need all the help they can get, for many of their people still live very crudely
on the reservation, clinging to the tribal ways and customs. Should they derive
financial help from this, it would provide a way to obtain income, a little more
honorable than bingo parlors and cigarette sales. It would also provide some
employment to tribal members.

I support the plan to drill this well, and while I am an environmentalist and a
rabid sportsman, I find no logical reason to deny the permit to do so.

Yours very truly,

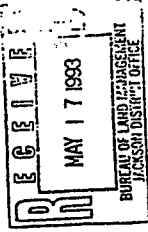
J. P. Dinkel
J. P. Dinkel

I-85

I-86

4650 54th Ave S. Apt 317
St. Petersburg, FL 33711
May 14, 1993

Mr. Robert Abbey, District Manager
Bureau of Land Management
411 Briarwood Drive Suite 404
Jackson, Mississippi 39206



Dear Mr. Abbey

I am very concerned about Shell Oil's request for permits to drill for oil in the Everglades. We have been working for too many years to preserve and protect this unique and valuable ecosystem to risk further threats to its existence.

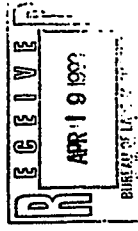
Our nation and Florida particularly should be concentrating its efforts on developing alternative energy sources rather than destroying areas like the Everglades which are productive in their present state.

I urge you to deny any permits to drill for oil in the Everglades.

Very Truly Yours
Emley N. Dipple

From the Desk of:
Guy A. DiStasio, M.D.

4/15/93



Gentlemen:-

Allowing oil drilling in the Everglades is the worst possible political maneuver I have ever heard.

I share in all of your Remembrance the people who put you persons in office - Please stop any such things!!!

Guy A. DiStasio M.D.

I-87

I-88

April 21, 1993

To Whomsoever is entrusted with the decision of Shell drilling in the Everglades:

Development has taken its toll, the sugar cane industry is still taking its toll, water diversion for increasing population demands is taking its toll and now exploratory oil drilling - what if it's found - oil won't last forever but the Everglades may if we're conscientious and prudent. Let's take No Drilling Please!

Suzanne Donohue 1131, 3067 Ten Plastering Rd. 33317

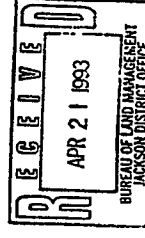
April 19, 1993

To whom My Concern:

Please do not support Shell's plan to drill for oil in the Everglades. Our ecosystem here in So. Fla. is very fragile. Our lives depend on the fresh water. One false move and the environmental impact on the lives of humans and our wildlife would be disastrous. Do not compromise. Do not be led astray by false promises. Please - do not allow this to happen.

Sincerely,

Thomas J. Hunsford
Charles C. Hunsford
4835 N. Edinburg Hwy. 1993
St. Louis, Mo. 63108



1-89

R 66 E U V E
 MAY - 3 1961
 BUREAU OF LAND MANAGEMENT

4/24/93

TO whom it may concern:

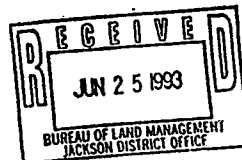
I'm writing this letter because I am very concerned about the possibility that Shell Oil comp. may drill off shore in the everglades.

Our state is suffering enough; (especially the unemployed) when it comes to expanding for others financial gains.

Our ecosystem (w/ life, our drinking water, our ocean life) will suffer. It's a gamble we shouldn't take!!

please help to preserve
our world; it is already
being destroyed at an
alarming rate. Why contribute
to it's destruction! Sincerely -
Elle Ourr -
mother of two -

1-90



June 22, 1993

Robert Abbey
District Manager
Bureau of Land Management
411 Briarwood Drive
Suite 404
Jackson, MS 39206

Re: Draft Environmental Impact Statement for Micoosukee 3-1 Well

Dear Mr. Abbey:

[illegible]

Thank you for your time and a vote to end the insanity!

Teresa A. Dwyer
Teresa A. Dwyer

Teresa A. Dwyer

I-91

May 12, 1993

Dear Sir:

Dear Sir:

Because the Everglades is such a unique ecosystem affecting the water supply of so many people, the climate, wildlife, and the economic system of South Florida, we urge you to protect it and restore it, and not permit Shell Oil to drill for oil. Please!! Consider the risks and difficulties that might occur.

Deny their application.

Sincerely,
Armand + Martha Wynne

Sincerely,

Sincerely,
Armand + Martha Wyner

I-92

I-93

DRAFT ENVIRONMENTAL IMPACT STATEMENT

APPLICATION FOR PERMIT TO DRILL
AN EXPLORATORY WELL
ON THE
MICCOSUKEE INDIAN RESERVATION

Written comments on the Draft Environmental Statement are being accepted until May 18, 1993. Comments on the analysis and the preferred alternatives are specifically sought. Please provide your name and address. Comments should be sent to:

District Manager
Bureau of Land Management
411 Briarwood Drive, Suite 404
Jackson, Mississippi 39206

Attention: Robert V. Abbey

COMMENTS: Even without any cases of oil spills just building roads will destroy the environment.

Arthur A. Fisher
3300 Water Oaks Dr.
Bollywood FL 33021

Fisher

RCVD
4/14/93

6550 SW 4th
Pembroke Pines, FL 33023

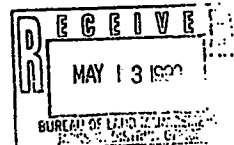
Robert V. Abbey
District Manager
Bureau of Land Management
411 Bharwood Dr. suite 404
Jackson, MISS 39206

Dear MR. Abbey:

This letter is concerning the drilling for oil in the Everglades, Florida. Although I don't completely disagree of the drilling, I think one must be very careful when it comes to the endangerment of the water that millions drink in Florida. However, I do agree to more detailed and less bios investigation from the government and from the oil companies. There is another detail also, there should regulation and inspections done everything that is done to the Everglades. Please keep informed of anything new that goes on in the everglades. I thank you in advanced for mailing to me al new development on the drilling.

Truly yours,

Manuel Elaraj



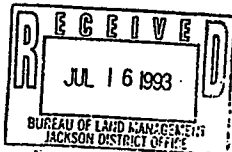
I-94

I-95

* COMTEX TEXTEL

1501560 KRGC X
MAILGRAM

TO: SECRETARY OF THE INTERIOR BRUCE BABBIT
1849 C STREET N.W.
WASHINGTON, D.C. 20240



APRIL 22, 1993

DEAR SECRETARY BABBIT,

I AM TAKING THIS OPPORTUNITY ON EARTH DAY TODAY TO ASK YOU AGAIN TO PLEASE DO ALL THAT IS POSSIBLE TO STOP SHELL WESTERN E AND P EXPLORATORY OIL DRILLING IN SOUTH FLORIDA EVERGLADES.

THIS OR ANY INVASION INTO OUR ONLY WATER SUPPLY AND THE ENVIRONMENTALLY SENSITIVE EVERGLADES IS BEYOND BELIEF.

PLEASE HELP US SAVE THE EVERGLADES, AND THE MANY ENDANGERED SPECIES IN THIS AREA OR WE MAY BE NEXT.

SINCERELY,

DON R. ELDERKIN
1931 S.W. 37TH AVE,
FT. LAUDERDALE, FL. 33312

* COMTEX TEXTEL

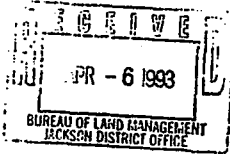
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Disconnect code : 13

5-1-93
We do not want oil drilling in the Everglades, nor anywhere else in Florida. Not now, not ever! There is a constant chipping away at our environment, by the "care less" & "careless" Money hunters!

Ms. Barbara J. Elliott
6 1/2 Victoria Rd
Largo FL 34644-2346



I-96



Dear District Manager:

I am a concerned South Florida resident asking you to please stop Shell Oil Co. from exploratory drilling in the eastern Everglades.

May I remind you that this is a CONSERVATION area, where our fragile environment is supposed to be PROTECTED, not threatened by a company whose only purpose is to make a profit at the expense of our main source of fresh water.

I am vehemently opposed to this drilling, and will do everything in my power to see that it is stopped.

Thank you for your time.

Wayne Engloff
Wayne Engloff

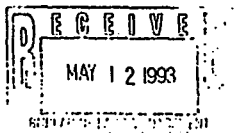
I-97

BUREAU OF LAND MANAGEMENT
411 DEERWOOD SUITE 404
JACKSON MS 39206

I SUPPORT THE FINDINGS IN THE DRAFT ENVIRONMENTAL
IMPACT STATEMENT ON SHELL OIL COMPANY'S PLANS
FOR THE DRILLING OF A PROPOSED EXPLORATORY WELL
ON THE MICCOSUKEE INDIAN RESERVATION.
THIS IMPACT STATEMENT AS PREPARED BY DAMES AND
MOORE CONSULTING CO., BOCA RATON, FLORIDA,
SHOWS THE THE PROPOSED ACTION, COMPLIES WITH
ALL REGULATIONS, ASSURING PROTECTION OF NATURAL
RESOURCES.

Lennard C. Ericsson

LENNARD C. ERICSSON
5719 18TH AVE N.
ST. PETERSBURG, FL. 33710



I-98

I just read in my local paper that
Shell Oil wants to drill for oil in
the Everglades. I can't believe that
such a sensitive ecological area would
ever be touched.
Hurricane Andrew did enough damage
to South Florida. Please stop this
drilling before one of the most beautiful
natural habitat is destroyed.

Marlene Ecocto

I-99

Apt. 504
1147 Hillsboro Mile
Hillsboro Beach, FL 33062
April 26, 1993



Jackson District Office
Bureau of Land Management
411 Briarwood Drive
Suite 404 \$31
Jackson, Mississippi 39206

Gentlemen:

PLEASE, PLEASE do not let Shell or any other oil company drill for oil in the Everglades water conservation area. Directional drilling which starts outside the area and then angles under the area is IN the area as far as I am concerned. Don't let this happen, on two bases:

1. Everything I have read, in National Geographic and elsewhere, indicates that the 'Glades are unique. No place else on earth has a river so very wide and so very shallow. I want to see this unique feature preserved so my great-grandchildren may see it--and the fragile 'Glades ecosystem has already been stressed to a perilous point.

2. There is too much danger of seepage or leakage of oil into into the three possible drinking water pools west of the Biscayne aquifer. As Florida's population and water demand grows, we may have to tap those sources. It would be tragic for the people of Florida to find those sources contaminated.

45

Thank you for considering my point of view.

Very truly yours,

Ethel E. Fallon

Ethel E. Fallon

I-100

Daytona Beach Florida
5-26-93

Mr. Robert V. Gilly
Dear Sir:

We understand that from now until November you will decide whether or not to issue Shell Oil Co. permit to drill wells in the Florida Everglades. Even though the Deep is not within Everglades Nat Park it is still in very good location for wildlife!

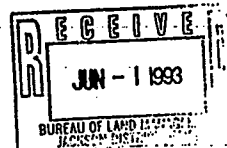
Now we will have natural gas for our supplies and oil will be gone.

I thank you for the permit.

We care for animals.

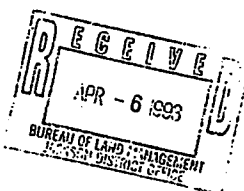
I thank you

Mrs. J. Fasano



M & J Fasano
633 Linabelle Street
Holly Hill, Florida 32117

I-101



Dear District Manager:

I am a concerned South Florida resident asking you to please stop Shell Oil Co. from exploratory drilling in the eastern Everglades.

May I remind you that this is a CONSERVATION area, where our fragile environment is supposed to be PROTECTED, not threatened by a company whose only purpose is to make a profit at the expense of our main source of fresh water.

I am vehemently opposed to this drilling, and will do everything in my power to see that it is stopped.

Thank you for your time.

Gregory E. Fernandez
Gregory E. Fernandez
Fernandez

I-102

PLEASE no drilling in our Everglades - We must stop destruction of this area!! Drilling will only hurt this area. Please listen to us! Ann Feters

MRS ANN FETERS
9021 NW 12TH CT
CORAL SPR, FL 33071-6636

1-103

RECEIVED
APR 6 1966
BUREAU OF LAND MANAGEMENT
DENVER DISTRICT OFFICE

Dear District Manager:

I am a concerned South Florida resident asking you to please stop Shell Oil Co. from exploratory drilling in the eastern Everglades.

May. I remind you that this is a CONSERVATION area, where our fragile environment is supposed to be PROTECTED, not threatened by a company whose only purpose is to make a profit at the expense of our main source of fresh water.

I am vehemently opposed to this drilling, and will do everything in my power to see that it is stopped.

Thank you for your time.

Allen Fialkoff
ALLEN FIALKOFF
Fialkoff

1-104

Charles & Lillian Finger
5861 NW 16th Pl. #109
Sunrise, FL 33313

April 15, 1943

To whom it may concern,

The mere thought of drilling for oil in the already diminished and endangered Everglades gives me an overwhelming feeling of nausea. It is beyond comprehension that greed has so overtaken any common sense, compassion and understanding of preserving this once beautiful land. This horrible plan can only be described as utter and complete insanity.

Lillian V. Finger
Finger

RECEIVED
APR 19 1993
BUREAU OF LAND MANAGEMENT
FEDERAL DISTRICT OFFICE

I-105

V. V. (VIRG) FOLAND
Executive Producer

105 S.W. 7th Avenue
Fort Lauderdale, Florida 33312
FAX: 305/524-4337

305/587-9565 Res. 305/524-4311

Keep the _____ out!

OIL

FROM PAGE 1B

Shell plan to drill for oil in 'Glades prompts protests

The Abbey opposing the drilling.

This is just another bogus hearing," speaker Laurie Shiver told Abbey and other officials. "Obviously, you're going to go ahead with your plan."

Among those against the drilling were representatives of the Broward County Office of Natural Resources Protection, the Broward

prepared for Shell and the land management bureau that concludes allowing the exploratory well would have only minor environmental impact. They said the study ignores the potential harm if this discovery of dozens of wells is successful, eventually a spill occurs.

"This environmental impact statement is nothing but a rubber stamp for Shell," Barry Marvet of the Broward Sierra Club said. "We're outraged that this important issue — industrialization of the Everglades — could be treated so trivially."

precautions.

"Members of the Miccosukee Tribe as much as, if not more than

RECEIVED
APR 19 1993
COMMENTS
BUREAU OF LAND MANAGEMENT
The department's opinion
ment on Shell's plans to
drill for oil is May 18.
Write:
Jackson District Office
Bureau of Land Management
411 Briarwood Drive
Suite 404
Jackson, Miss. 39205

I - 106

May 19, 1993

Mr. Robert V. Abbey, District Manager
Bureau of Land Management
411 Briarwood Drive
Jackson, Miss 39206

Dear Mr. Abbey:

We implore you to stop permits for Shell Oil Company to drill in Florida. We feel we have a unique sub-tropical eco-system, entitled, THE EVERGLADES!

This is not a partisan issue since both Nate Reed and Marjory Stoneman Douglas are committed to preserving what's left of southern Florida.

26 It seems that Shell may have based their applications on out-
dated maps and erroneous conclusions. We have had too many of
85 these out-dated evaluations which continue to erode our
environment.

Thank you.

Winnie Foster
311 57th Ave. S.
St. Petersburg, FL
33705

Sincerely,

Hinnie Foster
Vice Chair
Pinellas County, Fl.
Democratic Party

RECEIVED
MAY 21 1993
DEPARTMENT OF LAND MANAGEMENT
OFFICE

I-107

403 BAMBOO LANE
LARGO, FLORIDA 34640
MAY 17, 1993

BUREAU OF LAND MANAGEMENT
ATTN: MR. ROBERT ABBEY
411 BRIARWOOD, SUITE 404
JACKSON, MISSISSIPPI 39206

DEAR MR. ABBEY:

I AM WRITING TO YOU ON BEHALF OF MY FAMILY, AS WELL AS ON BEHALF OF THE MEMBERS OF THE SUNCOAST GROUP OF THE SIERRA CLUB LOCATED IN PINELLAS COUNTY, FLORIDA. THE SUNCOAST GROUP HAS OVER 1,500 MEMBERS WHO ARE CONCERNED WITH PROTECTING FLORIDA'S THREATENED NATURAL RESOURCES. OUR DRINKING WATER IS ONE OF OUR MOST PRECIOUS RESOURCES, YET ITS PURITY AND AVAILABILITY ARE UNDERGOING DAILY ASSAULTS.

ONE OF THE MOST GRIEVOUS PLANNED ASSAULTS IS THAT OVER WHICH YOU HAVE AUTHORITY TO DECIDE...THE APPLICATION BY THE MICCOSUKEE INDIANS TO PERMIT DRILLING BY SHELL WESTERN E & P IN BROWARD COUNTY.

HOW COULD THIS PROPOSED ACTION NOT BE A THREAT TO THE DRINKING WATER OF THE RESIDENTS OF THIS STATE WHEN THE DRILLING FOR OIL WILL BE IN CLOSE PROXIMITY TO THE WATER CONSERVATION AREA 3 AND MAY ANGLE UNDER THE CONSERVATION AREA?

DIDN'T THE FEDERAL GOVERNMENT SUE THE STATE OF FLORIDA RECENTLY TO PROTECT THE INTEGRITY OF THE EVERGLADES AND WIN THAT SUIT WITH THE RESULT THAT TAXPAYERS ARE NOW PAYING TO RESTORE THE EVERGLADES AND ITS ECOSYSTEM? HOW CAN THE BUREAU OF LAND MANAGEMENT, A FEDERAL AGENCY, NOW ACT AGAINST THE ISSUES OF THAT SUIT...PROTECTION OF A FEDERAL RESOURCE AND THE THREAT TO THE DRINKING WATER OF SOUTHEAST FLORIDA?

FLORIDA'S WATER MANAGEMENT DISTRICTS ANNOUNCED RECENTLY THAT THEY STRONGLY OPPOSED THE APPLICATION FOR DRILLING ON THE MICCOSUKEE LAND. MANY AREAS IN FLORIDA ARE UNDER WATER RESTRICTIONS, THERE ARE ALREADY WATER DISAGREEMENTS (WARS) GOING ON BETWEEN COUNTIES AS TO THE AVAILABILITY OF WATER RESOURCES, AND THE COST OF WATER IS GOING UP ACCORDINGLY. WE MAY BE FACING SERIOUS SHORTAGES IN THE NEAR FUTURE.

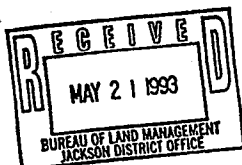
HOW CAN THE BUREAU OF LAND MANAGEMENT PERMIT SUCH DRILLING FOR OIL IN THE FACE OF THIS REALITY? IT IS THE SOLEMN RESPONSIBILITY OF THE FEDERAL GOVERNMENT TO PROTECT THE NATURAL RESOURCES OF THE COUNTRY AND TO PROVIDE FOR THE HEALTH AND WELFARE OF ITS PEOPLE.

THE INTEGRITY OF THE STATE OF FLORIDA'S DRINKING WATER MUST TAKE PRECEDENCE OVER THE COMMERCIAL INTERESTS OF AN OIL COMPANY AND A MISGUIDED NATIVE AMERICAN TRIBE. REFUSING THIS PARTICULAR USE OF THEIR LAND CANNOT BE CONSTRUED A "TAKING."

WHEN ALL IS SAID AND DONE, ONE FACT SHOULD DETERMINE THE OUTCOME: WOULD THIS DRILLING BENEFIT THE "COMMON GOOD" OR WILL IT ENDANGER IT?

SINCERELY YOURS,

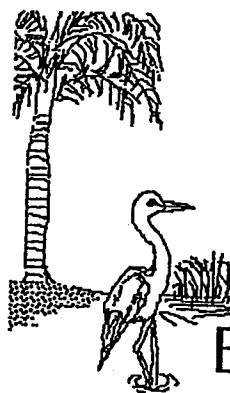
Linda M. Francis
LINDA M. FRANCIS



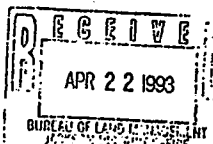
45

25

I-108



FOR
GODSAKES
SAVE THE
EVERGLADES!



April 18, 1993

Jackson District Office
Bureau of Land Management
411 Briarwood Drive, Suite 404
Jackson, Miss 39206

Dear Sir or Madam,

The proposed scheme to allow Shell Oil to drill for oil in the Everglades is more of a long term governmental policy to damage them.

My wife and I are seniors who have been visiting the Everglades for about 30 years. During that time we have witnessed the continuing degradation of the Glades for many reasons. These include a number of environmental insults:

The encroachment of general development from the press of population.
The interference with the natural flow of water from the poorly planned water regulation system, courtesy of the U.S. Army Engineers.
The agricultural chemicals introduced into the water in the Everglades.

Now comes the threat of an expansion of oil exploration and the possible development of oil fields, courtesy of Shell and your Bureau.

Enough is enough, oil field developers are sloppy, careless people, do not believe what they tell you. The truth is not in them. Turn them down!

Yours truly,

Clarence Freeman
Clarence Freeman

I-109

2510 N.E. 35th Street
Lighthouse Point, FL 33064
April 28, 1993

Jackson District Office
Bureau of Land Management
411 Briarwood Drive, Suite 404
Jackson, Mississippi 39206

Gentlemen:

I am writing to register my opposition to Shell's proposal to drill for oil in the Everglades.

Let's be honest. You know and we all know that drilling in the Everglades will sooner or later have an impact on this fragile and unique part of Florida, and that impact will be negative.

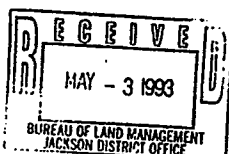
Haven't the Everglades suffered enough abuse already?

There is no commercial consideration in this world that can justify putting the Everglades at further risk.

We are ANGRY.

Sincerely,

Arthur M. Friedrichs
Arthur M. Friedrichs



I-110

May 23, 1993

Dear Mr. Abbey,
I hope you will refuse Shell Oil's request to drill in the Florida Everglades. Please protect the poor animals of that area from the harm which always accompanies such projects.

Animals have a right to live safely and in peace in their own home, just as human animals do. Why do we consider ourselves the Master Race? Isn't that attitude biological fascism?

Please respect the children of nature who have never harmed us. I thank you in advance, Sincerely,

Adolf Frisch
FRISCH

I-111

RCV
4/14/93

Gerald Fritz 270 S.E. 1st Terrace, Pompano Beach, FL 33060

Thank You for Listening to our Comments.

I am a Registered Republican, but am also concerned about the health of the Everglades Ecosystem.

* This ecosystem has been repeatedly abused in the past 100 yrs. and I would like it to be healthy so that when I have children, I can take them into the Everglades to enjoy its Biodiversity.

There are many other forms of energy production which need to be supported. Please, change the focus from petrochemicals. Please, support alternatives to the oil drilling in the everglades.

I-112

Senator Robert V. Abbey
District Manager, BLM,
Dear Sir;K. Frost
8650 W. Sandra St.
Crystal River, FL
34428-9650
May 7, 1993

I read in the paper that the Shell Oil Company wants to drill for oil in the Florida Everglades. Our Government stopped any one from drilling on any coast. Now, please do not let any Oil Company drill for oil in the Florida Everglades.

If you take too much solid rock, soil or oil, even water, out of the ground, Florida might sink into the ocean. We have had a lot of trouble with sink holes all ready.

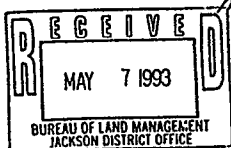
We Floridians do not want our nice state ruined by any Company trying to make a few more millions.

Please vote against any oil drilling in or around our state.

Thank you,

Kenneth L. Frost

I-113



Bureau of Land Management.

Dear Sir,

I am writing you on a proposal by Shell Oil Co. to drill a well in South Florida on the Miccosukee Indian Reservation. In the report by (DEIS) I feel with my personal experience with Shell oil they will do what is right with environmental problems.

I also feel with proper safety measures we in the U.S. should do all we can to find resources here, and maybe not be dependent on so much of a foreign source for our needs.

I thank you for the opportunity to consider my wish on this matter.

Sincerely,

Robert V. Abbey

I-114

MENTAL FLOSS

ECO

Let Shell drill in Hell

BY

ADRIAN AUMEN

Talk about outrageous.

With all the predictions about how much it's going to cost us to clean up the Everglades and the water wars that could divide South Florida, Shell Oil Company still wants to drill in the middle of the Everglades.

The very idea of poking more holes in the already ailing system and increasing risks to wildlife and water supplies is nothing short of arrogant.

So is Shell's attempt to "greenwash" the plan by presenting an Environmental Impact Statement that uses outdated maps and information. It only skims the surface of issues such as the effects on groundwater and future restoration plans.

The proposed drill site is at the edge of the Big Cypress National Preserve (located by the Collier/Broward line, north of Alligator Alley) and the world-renowned sawgrass marsh, a conservation area that keeps Broward and Dade counties from running out of water.

State rules prohibit direct drilling in the conservation area, so Shell came up with a way around it - by drilling at an angle. The drilling rig would be outside the conservation area, on land owned by the Miccosukee Indians (read: federal land). The end of the drill would be 4,700 feet east - smack dab in the conservation area, at 18,850 feet down.

Glick.

The drilling rig would stand in a cattle pasture within 200 feet of a canal and only 1,000 feet from a pumping station that funnels water into the Everglades water catchment areas. Imagine what a hurricane could do with that setup.

The area is also home to Florida

panthers, wood storks, Everglades kites, Everglades minks and, in the Shell study's own incriminating words, "other waterfowl" (sic).

Shell's tenacity would make you think it expects to find a pool of oil the size of Prince William Sound, but even the experts doubt there's much to be found. There's not much oil in Florida, and the oil that's here is of such poor quality that it's hardly worth refining.

Could it be worth losing the Everglades?

Shell admits that, if it finds oil, it's likely to seek more drilling. It also admits that spills are inevitable.

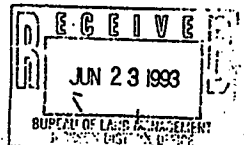
Exxon and other firms drilling nearby have been unable to prevent spills. Almost 163,000 gallons of crude oil and 120,000 gallons of plant-killing brine already have been spilled in the Everglades area. Unchecked, one gallon of petroleum can contaminate one million gallons of drinking water.

That's why about 300 South Floridians, and even some tourists, crammed a recent public hearing in Broward County to talk with Washington bureaucrats on the issue.

"Tell Shell to drill in Hell!" yelled some folks.

Others are cutting up their Shell credit cards and taking their business elsewhere.

Not a bad idea.

JOHN GALLÓ
838 Forest Hill Blvd.
W Palm Beach, FL 33405What you can do
Unless something changes, the U.S. Department of the Interior is expected to approve

Shell's plans soon. Besides cutting up your Shell card and boycotting the stations, here's some folks you can write. Or just mail them this column.

Bruce Babbitt
Secretary of the Interior
1849 C Street, NW
Washington, D.C. 20240
(202) 208-7150Carol Browner
U.S. Environmental Protection Agency
401 M Street, SW
Washington, D.C. 20460
(202) 260-4700Robert V. Abbey
District Manager of the Bureau of Land Management
Jackson District Office
411 Starwood Drive,
Suite 404
Jackson, MS 39203

I-115

April 15, 1993

DO NOT ALLOW Shell or ANY OIL COMPANY to DRILL IN THE EVERGLADES of FLORIDA!!!! This would be an EXTREMELY FLAGRANT USE of our WETLANDS and WATER TABLES; which are ALREADY POLLUTED and IMMENSELY OVER-USED.

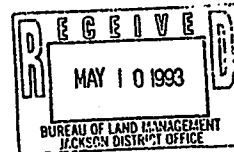
If you allow Shell, or anyone, to drill in the Everglades; it will LEAD TO ALMOST UNLIMITED DRILLING in the future! Everyone will want part of the action. This will surely lead to DISASTEROUS POLLUTION!!!!

Oil Companies in particular, and the Miccosukee Indians DO NOT NEED THE MONEY as badly as WE NEED ALL THE CLEAN WATER THAT WE CAN GET! Thank you very much.

Mr. & Mrs. Robert J. Gardner

I-116

May 3, 1993



Bureau of Land Management
411 Briarwood, Suite 404
Jackson, MS 39206

Gentlemen:

This is written to express my approval of and support for the conclusions of the draft environmental impact statement concerning the Shell Oil proposal to drill a well in South Florida on the Miccosukee Indian Reservation in western Broward County.

I'm enclosing a copy of my original letter to you on this subject, and would like to offer one additional comment. For things to work right in this country, we must all stop saying - "By all means do something about it (whatever it might be), but don't do it in my back yard."

Sincerely,

[Signature]

A. P. Garner
470 Village Place
Apartment 208
Longwood, FL 32779

I-117

April 24, 1991

Mr. Bert Rodgers
Jackson District Manager
Bureau of Land Management
411 Briarwood, Suite 404
Jackson, MS 39206

Dear Sir:

This is written in support of the Shell Oil Company proposal to drill a well on the Miccosukee Indian Reservation in Broward County, Florida. It seems to me there can be no doubt that we need to pursue every reasonable possibility for increased production of DOMESTIC energy of every kind.

Shell Oil Company has an outstanding record of environmental responsibility, as recognized by the U. S. Interior Department Conservation Award. In recent years, they have reduced total estimated emissions (annual SARA report) by 90%, and have cut by 87% the volume of hazardous waste from offshore operations. We need more citizens (private, corporate and governmental) like Shell Oil.

The proposed well location is on drained grazing land - not pristine Everglades - and is in an area which has already produced almost 100 million barrels of oil since 1943 without serious environmental impact. The drilling plan meets all governmental regulations and includes, among other precautions, the construction of a four foot berm around the drilling site, use of reinforced plastic liners under the rig, and a totally enclosed drilling fluids system.

There is one other point that I can't resist raising, simply because I've never heard anyone else mention it. I moved from Texas to Florida in 1967, and I like Florida very much. However, I do get a bit tired of listening to all the calamity-howling about the adverse effects of off-shore drilling for oil. I don't remember ever hearing a Floridian say he had refused to buy gas for his car because it might have come from a well off-shore of Texas.

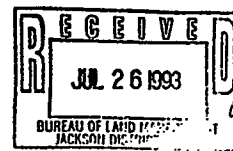
cc: Governor Lawton Chiles
Senator Bob Graham
Senator Connie Mack
Representative Bob McCollum
Shell Oil Company

Sincerely,

[Signature]

A. P. Garner
470 Village Pl #208
Longwood FL 32779

I-118



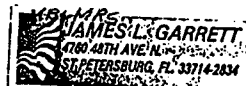
July 22 '93

Dear Sir:

The state of FL. does not want Shell Oil drilling in any part of FL, also Everglades, also off shore drilling -

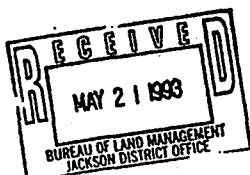
Sincerely,

James L. Garrett



I-119

I-120



May 14, 1993

Dear Mr. Abbey: SAVE THE ENVIRONMENT

Please deny Shell Oil a permit to drill an exploratory well in the Florida Everglades.

An exploratory oil well may mean a real oil well which will mean, "There go the Everglades!"

6/1/93
R. Gehlert & Family

May 1, 1993
I object to Shell Oil Company drilling for oil in the Everglades of Florida. The area is so fragile & the water supply can so easily be contaminated by oil. ~~Shut down the oil wells.~~
Jackson District Office
Bureau of Land Management
411 Biscayne Blvd
Suite 404
Jackson, Miss. 39206
The universe has about 100 billion galaxies each with about 100 billion stars. Our galaxy, the Milky Way, contains our star, the Sun. Out of all these stars in all these galaxies, our Sun is the only one we know with a planet that supports life. The earth and its living systems have evolved for five billion years... and now man and his technology have the power to destroy it all. We also have the power to save it.
Sincerely,
Gerlitz

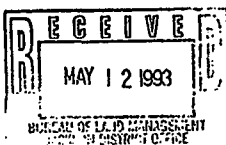
I-121

I-122

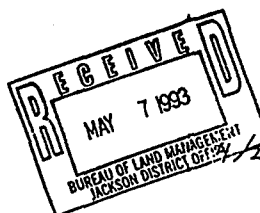
May 4, 1993
Bureau of Land Management:
Subject: Well drilling by Shell Oil
Missosaukee Indian Reservations
Broward County Florida.

I am writing in favor of this drilling. In my opinion, as a resident of Broward County it will have no real bad effect on the environment including water and wild life. Florida needs oil for its growing population and drilling will have no fall effect and could be a prosperous endeavor for the state population and benefit the people. A well such as this is so remote and its depth so deep, its impact on anything on the surface will occur only at the above ground point which will be most adequately protected in my opinion.

Thank you
Theodore H. Gilbert



Dear Mr. Abbey



45

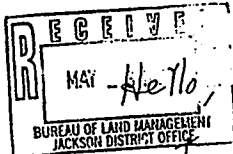
21

I has come to my attention Shell Oil Co. wants to drill in the Everglades. This troubles me and a few of my friends. The Everglades drainage system is South Florida's drinking water supply. The 'glades is already unbalanced. We don't want to risk it ANYMORE. If Oil is found there, how will it be transported? What if there's an oil spill in transport. Bye Bye Aquifer. It's just too risky! I don't think people of S. Florida realize the delicate problems we have now. I don't think they want to risk anymore. They should drill somewhere more stable! I wrote this letter to let you know I care. I don't want this.

Thank You
Darrin Gruffe

I-123

I-124



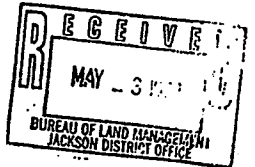
4-30-93

I don't think that drilling for oil in the Everglades should be allowed & IF I had more paper I would tell you why.

Gary Gold, 10092 Veral Place, Coral Springs, FL 33071

I'll bet this was the best letter you've gotten on this subject. 66

8025 Royal Palm Circle,
Tamarac, FL 33321



May 1, 1993

Robert V. Abbey
District Manager
Bureau of Land Management
411 Briarwood Drive, Ste 404
Jackson, MS 39206

Dear Mr. Abbey:

I am writing to urge you, most strongly, to deny any permit to drill for oil in the Everglades of Florida.

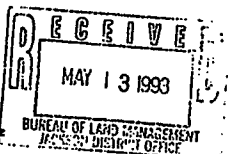
Please help protect our natural resources.

Sincerely yours,
Sidney L. Goldin

I-125

I-126

SIDNEY GOLDIN
327 SAN JUAN DRIVE (BOX 363)
PONTE VEDRA BEACH, FLORIDA 32082



May 7, 1993

Bureau of Land Management
411 Briarwood, Suite 404
Jackson, MS 39206

Gentlemen:

As your files have revealed, I previously have written you under separate cover in support of the proposal of Shell Oil Company of Houston, Texas to drill a well in south Florida on the Miccosukee Indian Reservation in western Brevard County. As I understand it, a draft environmental impact statement (DEIS) has been prepared for the Bureau of Land Management by Dames & Moore Consulting Company in Boca Raton, Florida. I am writing to strongly urge you to support the conclusion of the DEIS.

The DEIS states that the drilling of the proposed exploratory well would cause some short term disturbance to components of the human and natural environments, but would not have a significant impact on water, air, vegetation, wetlands, or wildlife. Further, that measures to mitigate short term disturbances are recommended in the document and will be implemented. According to the environmental study, investigations indicate that the important potable ground water sources, such as the Biscayne aquifer and sensitive water bodies such as water conservation area 3A are sufficiently protected by distance and physical barriers so as to be unaffected by the proposed drilling. Additionally, ground water velocities in all of the aquifers are extremely slow which would allow any underground contamination to be effectively cleaned up in the very unlikely event that it should occur.

Therefore, supporting my past position, I strongly urge your approval for the drilling of the proposed exploratory well.

Trusting that you will give our recommendation strongest consideration and final approval, I am,

Yours very truly,

Sidney Goldin
Sidney Goldin

Boca Raton, Florida
May 5, 1993

Mr. Robert V. Abbey, District Manager
Bureau of Land Management
411 Briarwood Drive, Suite 404
Jackson, Mississippi 39206

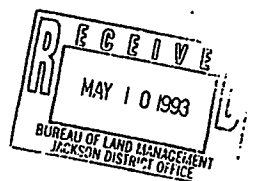
Dear Mr Abbey:

I am writing to support the draft environmental impact report (DEIS) prepared for you by Dames and Moore Consulting Company.

I have been a resident of Florida for many years and have a real interest in protecting the environment but I am also aware of the public need of the many items made from crude oil, for which, unfortunately we must largely depend on foreign imports. The conclusion of the DEIS report seem to make it clear that no long range environment damage will result and I am sure the short range concern can be corrected. In view of this I again strongly support the DEIS report findings and urge its acceptance.

Sincerely,

C.B. Goodman
C. B. Goodman
510 N.E. Kay Terrace
Boca Raton, Florida 33432



I-127

I-128

Gentlemen/Ladies - 4/16/93

PLEASE THINK OF THE FUTURE AT THE SAME TIME YOU'RE CONSIDERING ALLOWING THE SHELL DRILLING IN THE EVERGLADES: MORE THAN LIKELY THERE WILL BE NO IRREPARABLE DAMAGE (EXCEPT INCREASED STRESS ON THE LAND) FROM OUR WILL, BUT

1) IT CREATES A PRECEDENT SO FUTURE REQUESTS FOR DRILLING THAT SINKS UNDER ANY OTHER IMPORTANT LAND WOULD BE POSSIBLY CATASTROPHIC

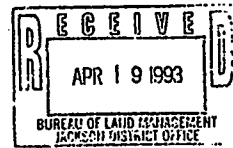
2) IF IT IS SUCCESSFUL, THE HYSTERIA? MOMENTUM? MAD RUSH TOWARDS MORE WELLS GOING GASILY BE LIKE A STAMPEDE & ALL GOOD INTENTIONS TRAMPLED AND LOST!

THANKS FOR LISTENING!

801 W. Oakland Park Blvd., B-3
Oakland Park, FL 33311

23

Jackson District Office
Bureau of Land Management
411 Briarwood Drive
Suite 404
Jackson, Miss. 39206



April 15, 1992

Dear Sir/Madam:

It is unbelievable that you would allow oil drilling to take place in the Florida Everglades. I am very strongly opposed to this and must strenuously voice my objection to this action. Even with all precautions being taken against an oil spill, there are still many reasons against oil drilling in the Everglades. The animals, some of whom are on the Endangered Species List, are at risk just by having the people and equipment there. They would retreat from the area and they don't have anywhere else to go as all the areas surrounding the Everglades are populated and heavily built up. i.e. Florida Panther

What about the water tables? The drilling is certain to disturb them. They want to drill right through our water supply. If a spill occurs and even if it is contained there is no guarantee that our water will not be contaminated! This our supply of drinking water that is being put in jeopardy!

There are also rare forms of vegetation that could be harmed or eliminated by the entry of an oil rig and crew. It has been proven in the past i.e. straightening of the inland waterways, that disruption of our natural environment is dangerous. The Everglades are essential to the balance of nature in Florida.

It would be totally irresponsible to allow drilling in the Everglades. The only people who want this drilling want it for

45

I-129

I-130

2.

only one reason, GREED. They are not concerned with the well being of the people of Florida or the safety of the animals or total environment. If you give them an inch of land to drill on they will want a mile and more in the future. Then the Everglades will be no more and Florida will no longer be able to exist as it does now.

STOP AND THINK NOW!

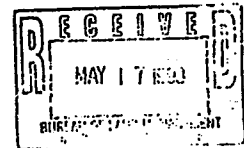
Yours truly,
Heather Grand
2112 Cypress Bend Dr. S. Apt. 806
Pompano Beach, FL 33069

TO: BUREAU OF LAND MANAGEMENT
FROM: DAVID GREEN
SUBJECT: DRAFT ENVIRONMENTAL IMPACT STATEMENT

I SUPPORT THE FINDINGS IN THE DRAFT ENVIRONMENTAL IMPACT STATEMENT ON SHELL OIL COMPANY'S DRILLING PLANS ON THE MICCOSUKEE INDIAN RESERVATION.

David Green
DAVID GREEN
1311 CALCUTTA DR
GULF BREEZE, FL 32561

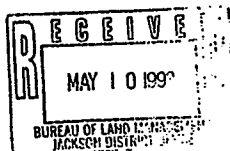
MAY 2, 1993



I-131

1994 Mid Ocean Circle
Sarasota, FL 34239
May 4, 1993

Bureau of Land Management
411 Briarwood, Suite 404
Jackson, MS 39206



Gentlemen:

I understand that one of the large oil companies is requesting permission to drill on the Miccosukee Indian Reservation.

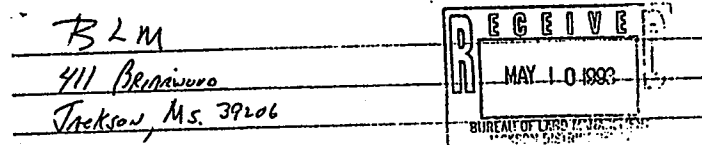
In my estimation due to our dependancy on foreign oil permission should be granted, providing the oil company gives you assurance that any damage of any kind will be promptly corrected.

We in the United States of America have encountered difficulties in the past, and oil companies should be encouraged to develop sources for gas and oil here at home.

Sincerely,

Edward B. Green
Edward B. Green

I-132



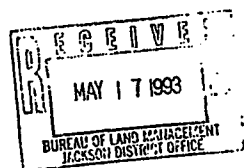
BLM
411 Briarwood
Jackson, MS 39206

BLM,
I would like you to know, that
I support the findings in the draft
ENVIRONMENTAL impact statement on Shell's
Drilling plans on the Miccosukee Indian
Reservation in Broward County in the state
of Florida.

Certainly, we need to be independent
of foreign oil and this would be a step
in the right direction.

Thank you,
Thomas H. Bundram
Thomas H. Bundram

I-133



May 12, 1993

Bureau of Land Management:

My family and I moved to Pensacola Florida from Traverse City Michigan three years ago. We chose to live in Pensacola because it resembled Traverse City in many ways. We consider ourselves fortunate to live in such a beautiful State.

While living in Northern Michigan we were exposed to a controversial subject. Several oil Companies held mineral leases in the Pigeon River National forest but were unable to drill because of potential environmental problems. The final outcome was the Department of National Resources gave Shell Oil Co. permission to operate the wells in behalf of all of the oil companies.

The drilling program resulted in a minimal environmental impact. Many of the DNR officers believed that the program actually enhanced the wildlife habitat.

Shell Oil Co. demonstrated there professionalism by exceeding the requirement of the State and the Department of National Resources in many of there operating procedures. Based on the prudent practices demonstrated in this program I'm supporting the proposal to drill in the Miccosukee Indian Reservation in Broward County Florida.

I would like a summary of the environmental impact statement and any further updates in this matter.

Sincerely,
J.J. Guyett
3103 Brittany Pl.
Pensacola, Florida

I-134



900 Intracoastal Dr.
Ft. Lauderdale FL 33304

May 3, 1993

Jackson District Office
Bureau of Land Management
411 Briarwood Drive, Suite 404
Jackson, Miss. 39206

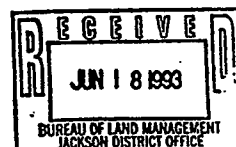
Because I believe this is terribly important, I am writing to ask that:

NO DRILLING be permitted in our Everglades

This in response to a notice in a recent issue of the Fort Lauderdale SUN SENTINEL.

Eleanor Haarmeyer
Eleanor Haarmeyer

I-135



June 13, 1993

Mr. Robert Abbey,

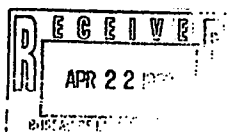
I am writing this letter on behalf of all living creatures in the everglades. We have already done enough damage to the everglades and the earth... Please don't allow "Shell" to drill in the Everglades... let's save what's left! I would appreciate your support on this issue.

Thanks
Shari + the animals
will thank you too!
Shari Haas

I-136

Mr. Robert Abbey
Jackson District Office
Bureau of Land Management
411 Briarwood Drive
Suite 404
Jackson, Miss. 39206

April 18, 1993



Dear Mr. Abbey,

I read about the hearings on the proposed drilling by Shell Oil in the Everglades in a recent article in the Florida Sun-Sentinel. As part of your decision making process, I would urge you to consider these additional comments.

Firstly, I was totally shocked to read that such an effort was under serious consideration. I was further surprised that this was the first I was hearing about it, after the fact (the hearing) since I had not seen or heard of any notices of the hearing even though I read the daily papers and watch the TV news.

It seems ludicrous to me that you would consider risking the health and welfare of a whole immediate population, both humans and animals, for the sake of benefiting a private company or should I say an influential private company. As you well know, such an operation would be very risky in terms of an oil spill even with the best of safeguards in place. Unfortunately, I don't believe that there can be enough safeguards. And in the event of a catastrophe, who will foot the bill? Shell? The government? The taxpayers? I think the priorities are all mixed up. How much research has been done to insure a 100% chance of success? Are all cleanup measures thoroughly thought out and in place? Who will benefit from the operation and to what degree? Does the risk go with the beneficiaries?

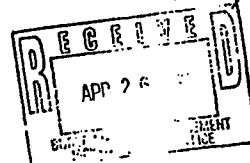
I would respectfully ask that you consider all of these things and make the 'right' decision, i.e. disallow this pending nightmare.

Sincerely,
Albert Haerberle
Albert Haerberle

A. Haerberle
4700 Sherwood Forest Drive
Delray Beach, FL 33445

I-137

APRIL 18 93



Dear MR. ABBEY:

I'm very concerned and interested in the promotion of SHELL'S OIL project on the Miccosukee reservation.

We must take advantage of our own natural oil resources & not be dependent on foreign imports of oil, making other countries & tyrants rich & wealthy.

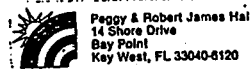
Let shell proceed with the exploratory well and see what quantity & amount we have and make a permanent decision at that time. We have fanatical activists all over our country contributing nothing but trouble & costing our government head aches & much money. I live in Florida & I know the water table will not be damaged or destroyed as these fanatics we, claiming. Give Shell

I-138

Yours truly,
Seldon W. Hargis

P.S. Give the Indians a chance,
they were exploited enough
over the last 100 years
average Americans.

I-139



July 8, 1993



Mr. Robert V. Abby
District Manager
Bureau of Land Management
411 Briarwood Drive Suite 404
Jackson MS 39206

Dear Mr. Abby:

Recently it has come to my attention that there is a request from Shell Oil to obtain a well permit intended to drill beneath the Everglades Conservation area #3A in search of oil. This is very disturbing to myself and many of my friends and relations, because we have already witnessed first hand the destruction that can come to a wilderness or sensitive ecosystem when the implementation of even the slightest amount of disturbance. I live in the Florida Keys and in less than 15 years I know the tragedy of too many people and too much development in this area. Most of the fish are gone, the gulf is no longer thriving with life; in fact it has been so devastated (just by over population, boats, fishermen) that it is a proverbial desert out there. NO Coral, NO Urchins, NO life, but some barracuda and sharks. This could have been avoided by education and some planning. Now Key West is using injection wells that directly contaminate the water and ground table further. This is bad enough. Now we have a chance to say "NO" to this drilling - let's say "NO" don't destroy the only link to life left for Florida, the Everglades is our #1 resource of water for wildlife and the state. It has been severely threatened already by covering it up and building on top of the precious ecosystem. Please save our only last hope for Florida's growth.

Oil and Water don't mix.

We are truly concerned citizens of these United States of America. We need to remain proud of our country and the first step is our care of natural resources.

Florida has always opposed any type of exploration and for drilling of any kind. We are determined to remain free from such exploitation.

Thank you.

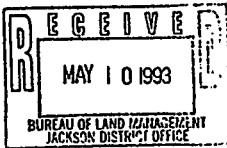
Peggy J. Hall

Robert James Hall

I-140

John E. Harman
900 N. Broad St. - 4130
Brooksville, Florida 34601
May 6, 1993.

BUREAU OF LAND MANAGEMENT
411 Briarwood, Suite 404,
Jackson, MS 39206.



In Re: Proposed Exploratory drilling well by
Shell Oil Company in western Broward
County, Florida.

Dear Sirs:

As one who has followed the U.S. Oil Industry for over 50 years, I urge your favorable action on the requested permit to drill this well, for three paramount reasons.

First, as a nation, we need all additional petroleum reserves that can be found by exploratory drilling. Our whole economic structure is fuelled and fed by oil & gas. And the availability of foreign sources can not be assured, as we have learned in recent years. And we manage to find only about as much as we use currently.

Second, You could not find a better oil company than Shell for this test. As the largest offshore producer with extensive experience in all types of delicate and difficult drilling operations from the Gulf Coast to California to Alaska to the Bering Sea and overseas, they have never had a serious accident to foul the environment.

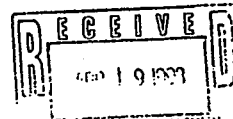
Third, Shell has a highly developed policy and program to enhance our environment, and spares no effort to avoid any material degradation of the environment. Their record is outstanding.

Respectfully yours,

John E. Harman

I-141

Mr. Robert Abbey
Jackson District Office
Bureau of Land Management
411 Briarwood Drive
Suite 404
Jackson, Miss. 39206



Dear Mr. Abbey,

I am writing to express my deep concern and abhorrence to possible drilling in search of oil in our everglades.

I strongly recommend reviewing Shell Oil's motive, promises and consequence of an exploratory well being so near the Biscayne Aquifer. (Please review the problems and deficiency of Big Cypress Swamp.)

The ancient marshland is a key link in our water supply, moderates our climate and attracts one million plus tourists to our area. It has been decreed a place of safety for wildlife and a zone of our planet where life naturally occurs - set apart from development. Such an area is vital and not an appropriate place for industrial activity.

Rest assured I will do all I can to stop any drilling and will encourage all Floridian's and American's to speak out - write out and vote out against this!

Sincerely,

Denise Harris
1536 N.E. 30th Court
Pompano Beach, FL 33064
Voter Registration # 1660823

cc: Gov. Chiles
Pres. Clinton
Vice Pres. Gore
Sen. Shaw
Rep. Rayson
Shell Oil

I-142

I-143

4-26-93

2438 Old Coach Trail
Clearwater, Fla, 34625

Bureau of Land Management
Jackson, MS.



Dear Sirs:

I support the proposal by Shell to drill a well in South Florida (Miccosukee Reservation). The draft environmental impact statement concludes the proposed exploratory well would not have a significant impact on the environment.

Yours truly,
H.L. Hassell

Dear Whomever it concerns:

This letter is in regards to the plan for Shell to drill for oil in the Everglades. I am a concerned citizen who was deeply upset about these plans.

The people of the U.S. + the world must begin respecting our natural resources and its conservation before there comes a point of no return. I understand Shell intends to take precautions against environmental harm, but of course none of these are full proof + chances of environmental damage/destruction is very possible.

I urge you to reconsider this plan not only for myself, but for our children + our children's children. We must respect our environment.

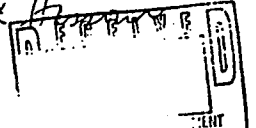
Needless to say, I will take my business elsewhere than Shell, if this does happen to go through. I refuse to support such selfish + inconsiderate companies.

Thank you for your time!

Sincerely,

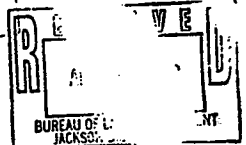
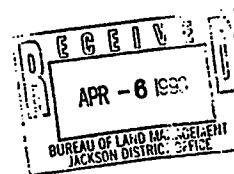
Janet K. Heiman

9632 NW 7th Circle #1722
Plantation, FLA 33324



I-144

I-145



Dear District Manager:

I am a concerned South Florida resident asking you to please stop Shell Oil Co. from exploratory drilling in the eastern Everglades.

May I remind you that this is a CONSERVATION area, where our fragile environment is supposed to be PROTECTED, not threatened by a company whose only purpose is to make a profit at the expense of our main source of fresh water.

I am vehemently opposed to this drilling, and will do everything in my power to see that it is stopped.

Thank you for your time.

Joan Heiman
Joan Heiman

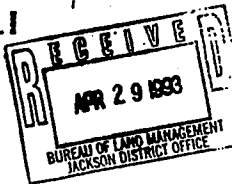
To Whom it May Concern: 5-12-93

Do not allow drilling for oil in the Everglades. We need tighter restrictions to control our drinking water resources; these resources have already been polluted with harmful chemicals.

William Heim

I-146

DON'T LET SHELL OIL DRILL!



April 19, 1993

Mr. Robert Abbey
Jackson District Office
U. S. Bureau of Land Management
411 Briarwood Drive
Suite 404
Jackson, MS 39206

Gentlemen:

Native Americans have a saying that they are the "caretakers" of Mother Earth and their philosophy is that it is mankind's responsibility to take care of the earth and her creatures for the next seven (7) generations.

It should be the Land Management's responsibility to protect the Everglades for generations yet unborn. If the Everglades was a patient, doctors would say it is already in critical condition. There is a delicate balance in the environment of the Everglades and MAN'S callousness, ignorance, greed and abuse are guaranteed to tip the scales. **WHAT WILL SHELL OIL DO WHEN THEY ARE SITTING ON TOP OF A DEAD PLANET?**

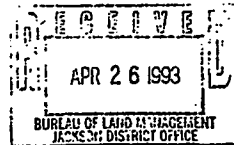
Men come and go. Mother Nature survives. Leave the Everglades alone, Mother Nature knows what she's doing.

Sincerely,

J. Heiser

J. Heiser #109
118 Lake Emerald Drive
Oakland Park, FL 33509

I-147



Jackson District Office
Bureau of Land Management
411 Briarwood Drive
Suite 404
Jackson, Mississippi 39206

To whom it may concern:

As a south Floridian who values the environmentally sensitive Everglades, I am adamantly opposed to Shell Oil's plans to drill for petroleum there. No number of precautions can assure that contamination will not eventually occur, due either to a natural or human-induced disaster. I urge you to make all efforts to thwart Shell's plans to exploit the Everglades... before it is too late for our wildlife, our economy, our water supply, and the preservation of the unique and natural beauty of the Everglades.

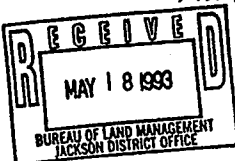
Very Concerned,

Dorothy M. Henfield

I-148

MAY 15, 1993
THIMOSIA TRAIL
ORLANDO BEACH
FL 32174

BUREAU OF LAND MANAGEMENT
411 BRIARWOOD, SUITE 404
JACKSON, MS. 39206



GENTLEMEN:

THIS CONCERNS THE DRILLING OF A WELL BY SHELL OIL CO. ON THE MICCOSUKEE INDIAN RESERVATION IN BROWARD COUNTY, FLORIDA.

I RETIRED FROM SHELL IN 1979 AFTER 30 YEARS OF SERVICE MAINLY IN THAT COMPANY'S EXPLORATION AND PRODUCTION ORGANIZATIONS IN WEST TEXAS, OKLAHOMA, CALIFORNIA AND LOUISIANA. I CAN TRUTHFULLY AND PROUDLY STATE THAT SHELL WAS A COMPANY THAT WAS METICULOUSLY CAREFUL ABOUT DOING ITS WORK IN CONCERT WITH SAFEGUARDING THE LOCAL ENVIRONMENT.

NOW, AS A FLORIDIAN I AM CERTAINLY CONCERNED ABOUT SAFEGUARDING OUR WATER SOURCES AND OUR VANISHING WILDLIFE. HOWEVER, I HAVE NO DOUBT THAT MY OLD EMPLOYER, SHELL, WILL DO ITS USUAL FINE JOB IN MINIMALLY DISTURBING OUR ENVIRONMENT.

I URGE THAT SHELL BE GIVEN THE GO AHEAD TO DRILL AND HOPEFULLY FIND PRODUCTION. OUR COUNTRY NEEDS THE NEW SOURCE OF OIL/GAS AND OUR STATE NEEDS THE BOOST IN ITS ECONOMY.

Sincerely,

Walter L. Fleming

I-149

April 17, 1993

Jackson District Office
Bureau of Land Management
411 Briarwood Drive
Suite 404
Jackson, Miss. 39206

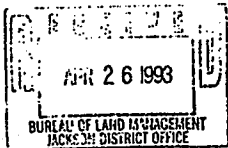


To whom it may concern;

I am writing to oppose the planned drilling for oil in the Florida Everglades. What I find amazing is that this plan is even being considered. The Everglades are certainly under enough strain without the added consequences of oil drilling. The possible outcome of a spill is unthinkable and should make this plan obsolete. Now is the time to start utilizing other forms of fuel; our resources can only hold up for so long. My home being in South Florida, I could greatly be affected by any mishaps in the plan. Please, please throw this proposal out and tell Shell they can drill in hell.

Thank you for your time;
Margie Henry
8708 NW 18 W.
North Fort Myers, FL

I-150



3800 N.W. 6 Ave.
Pompano Beach, FL 33064
April 15, 1993

Jackson District Office
Bureau of Land Management
411 Briarwood Dr., Ste. #404
Jackson, MS 39206

Dear Mr. Abbey:

NO oil drilling in the Everglades !!!

I thought this country was a democracy.
98% of So. Floridians vehemently
oppose Shell Oil's plan to drill a well
on the Miccosukee land in the Everglades.
The 2% that are for it don't care
about the delicate ecosystems and
threat to the water supply of millions
of people - they are driven by greed.

Haven't the government done enough
to hurt the Everglades, with the
Kissimmee River destruction - that they
now plan to spend billions to try
to reverse their mistake?

If the BLM approves this rape of
the Everglades, they should change
their name to Bureau of Land Destruction.
Our government is supposed to

I-151

serve its people, not run roughshod
over their wishes and best interests
to the gain of a few greedy business
people.

Now dare you even consider it!
To think our taxes pay your salaries!

And Shell Oil - I wouldn't buy
from them if I was out of gas!

Exports going under in So. Florida
- even with the cheapest prices of the
major brands - because so many
of us won't buy there out of anger
over the Alaskan oil spill.
Shell is next. And if this goes
thru' with your approval, I promise
you, I'll take time I can ill afford
to find out who appoints BLM
people and what can be done to
change things there, drastically.

Who is your master - the few
greedy oil men and Indians - or the
people of Florida and the protection
of its lands?

Sincerely,
Sheri Hensley

I-152

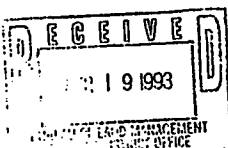
17 Apr 1993

Gentlemen -

As comparatively new and
happy residents of the beautiful
state of Florida, we implore
you not to allow the drilling
for oil in the Everglades. This
proposed project could open a
Pandora's Box that could ruin
the quality of life in all of
Florida.

Again, please consider carefully
all the implications.

Apprehensively,
Morton & Rita
Hepler



I-153

5/1/93

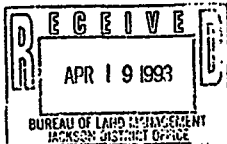
Dear Mr. Abbey,

Please be aware
that Floridians
do not want any
drilling in our
fragile and precious
Everglades.

Thank you,

M. M. Hensley
14209 93 AVEN.
Seminole, FL.

I-154



Jackson District Office
Bureau of Land Management
411 Briarwood Dr.
Suite 404
Jackson, Mississippi 39206

Dear Sir or Madam,
What an outrageous idiotic
plan it is, to allow any kind
of oil drilling in our everglades!
There is no guarantee
whatsoever that our drinking
water and wild life would
not be endangered.
Even if there were an oil
supply emergency, WHICH THERE IS
NOT, there has been enough
of human encroachment on
our everglades.
Enough is enough!

Please, no drilling of any
kind, no exploration -

Sincerely, Richard

RICHARD J. HESS
2424 NE 8TH ST. 308



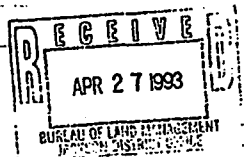
I-155

DEAR SIR,
Don't let Shell oil
drill our everglades (Florida).

THANK YOU

MR. DANIEL HIGGINS
187 PARK AVENUE
Gates, New York

14606



I-156

April 15, 1993

Jackson District Office
Bureau of Land Management
411 Briarwood Drive
Suite 404
Jackson, Miss. 39206

To Whom It May Concern;

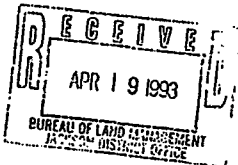
I fervently hope that there is somebody who is
concerned about the impending decision to sacrifice another
natural environment.

I am writing to express my emphatic opposition to the
idea of drilling for oil in the Everglades. Having just now
found out that this is even a consideration, I am writing in
a state of disbelief.

How many oil spills, with accompanying sights of
desecrated shorelines and suffering oil-slicked animals are
we going to have to view on T.V. before we learn that there
is no such thing as a "safe" oil operation?

What consideration has there been given to how Shell
Western's oil drilling operation, and the surrounding
environment will be safeguarded during a hurricane? One
look at Andrew's destruction should speak a thousand words.

I admit to driving an automobile that needs petroleum
products to function. I realize the oil companies must
search for fuel somewhere, but more than that, I realize the
need for protected areas in this vastly beautiful land of
ours. The Everglades are supposed to be one of those



24

I-157

protected areas, and they suffer enough damage from
civilization's nearby encroachment. Please let's not
subject it to more of mankind's "safe" attempts to fulfill
our needs while ignoring the needs of the natural
environment.

Sincerely,

Linda A Hill
3001 S. Ocean Dr., Apt. PHR
Hollywood, Florida 33019

I-158

Dear Mr. Abbey.

4/24/93

I strongly advise that you deny Shell Oil Company's permit to drill for oil in the Everglades. The Everglades is a unique ecosystem and is in severe distress now.

Sincerely,

Edith Hilton

740 Woodmont Terrace
TAMPA, FL 33321

I-159

202 S. W. 63 Avenue
Plantation, FL 33317
May 9, 1993

Mr. Robert V. Abbey
District Manager
Bureau of Land Management
411 Briarwood Drive #404
Jackson, Mississippi 39206

Sir:

I am writing to you to urge that the application of the Shell oil Company for permission to drill for oil in the Everglades be challenged and denied.

The Everglades is a system unique in the entire world. Not only is it a natural wonder, but it serves as a recharge area for the potable water of thousands of people.

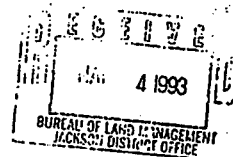
23

The Everglades is a fragile, water-soaked land that has undergone tremendous stress and deprivation. Its flora and fauna have been decimated. The land now needs restoration. The proposed drilling would further damage this life-giving area and would set a terrible precedent for further destruction. Drilling brings roads, storage areas, support facilities, and general ruin to a pristine area. The run-off from drilling would mean death to the immediate environment, wildlife destroyed, and the way opened for other incursions into an area that should be secure from for-profit adventures.

South Florida citizens count on this land for protection and recharge of their aquifer. This world-class environmental treasure should not be destroyed for the specious argument that we need oil. Conservation and other energy sources should be pursued by our government rather than the destruction of our environmentally sensitive and productive natural lands.

Sincerely yours,

Helen Hirschfeld



I-160

DON'T LET SHELL OIL DRILL!

April 19, 1993

Mr. Robert Abbey
Jackson District Office
U. S. Bureau of Land Management
411 Briarwood Drive
Suite 404
Jackson, MS 39206

Gentlemen:

Native Americans have a saying that they are the "caretakers" of Mother Earth and their philosophy is that it is mankind's responsibility to take care of the earth and her creatures for the next seven (7) generations.

It should be the Land Management's responsibility to protect the Everglades for generations yet unborn. If the Everglades was a patient, doctors would say it is already in critical condition. There is a delicate balance in the environment of the Everglades and MAN'S callousness, ignorance, greed and abuse are guaranteed to tip the scales. WHAT WILL SHELL OIL DO WHEN THEY ARE SITTING ON TOP OF A DEAD PLANET?

Men come and go. Mother Nature survives. Leave the Everglades alone, Mother Nature knows what she's doing.

Sincerely,

Mary Catherine Holworth
Mark William Holworth Jr.

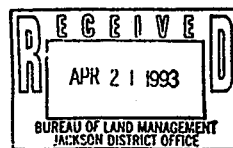


I-161

Mrs. William N. Homer
2520 Northeast 35th Street
Lighthouse Point, Florida 33064

April 17, 1993

Jackson District Office
Bureau of Land Management
411 Briarwood Drive
Suite 404
Jackson, Miss. 39206



Dear Sirs:

"Re: Drilling for oil in the Everglades"

My husband and I (and so many of our non-writing neighbors) are terribly dismayed over plans to drill for oil in the Everglades. This has been not only a protected area for very good reasons, it is also our only water source. If this is jeopardized, what can we do? It seems to us the developers and oil companies with their lobbyists always have the last say... and the power to push these projects through. It is, as though, you could care less than a hoot about the present inhabitants.

→

I-162

I do hope you will take this letter as representing many, many votes against this project, and start putting that money, energy and knowledge into finding alternative sources of energy, and other places to drill, if you must drill.

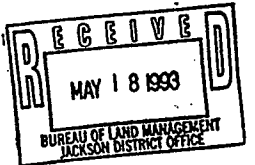
Sincerely yours,

Jeannette + William Homer

I-163

John J. Hopkins
51 Pine Drive
Homosassa, FL. 34446

May 14, 1993



Bureau of Land Management
411 Briarwood, Suite 404
Jackson, MS. 39206

Re. Miccosukee Indian Res. - Shell Oil

Dear Sirs:

In connection with the proposal of Shell Oil Company to drill a well on the Miccosukee Indian Reservation, I would like to register my support of the proposed project.

It appears that Shell has investigated the impacts on the area and the environment with the preparation of a draft environmental statement prepared a respected consulting firm and that the conclusions are favorable for the venture.

Shell is a company that is strongly influenced in the direction of environmental protection and has the financial support to provide the necessary safeguards to prevent deleterious effects.

Therefore, in the absence of any previously unknown negative impacts, I support the Shell proposal which should improve our country's position in providing a needed domestic product using American labor.

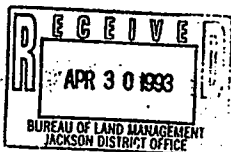
Yours truly,

John J. Hopkins

John J. Hopkins

I-164

Mr. Scott Horowitz
4740 N. 36th Ct. • Hollywood, FL 33021



Dear Robert Abbey,

As a taxpayer of South Florida, I do not support oil drilling in the everglades for several reasons. First, oil could leak into our water supply. This could hurt our drinking water. Second, there could be a spill that could cause a lot of animals to die in the everglades. A lot of birds would leave the area. Finally, a storm could do damage on the oil site. For instance, the storm could break the oil ridge and turn it over. This could cause a major oil spill that will develop in the everglades. These causes will make anybody wonder why you want to drill oil in the everglades.

from
Scott Horowitz

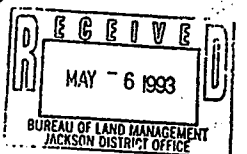
I-165

US DEPT OF INT

REFERENCE

3160 (020) 3 V

MAY 4, 1993



It appears that all environmental concerns have been met in regard to putting a well in SW Florida.

I am in favor of allowing the well to be drilled on the Miccosukee Indian Reservation.

Thank you for keeping me informed

W. W. Horstman

W. W. Horstman, Jr.

I-166

DON'T LET SHELL OIL DRILL!

April 19, 1993

Mr. Robert Abbey
Jackson District Office
U. S. Bureau of Land Management
411 Briarwood Drive
Suite 404
Jackson, MS 39206

Gentlemen:

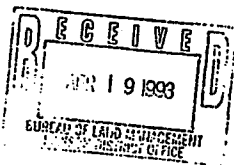
Native Americans have a saying that they are the "caretakers" of Mother Earth and their philosophy is that it is mankind's responsibility to take care of the earth and her creatures for the next seven (7) generations.

It should be the Land Management's responsibility to protect the Everglades for generations yet unborn. If the Everglades was a patient, doctors would say it is already in critical condition. There is a delicate balance in the environment of the Everglades and MAN'S callousness, ignorance, greed and abuse are guaranteed to tip the scales. **WHAT WILL SHELL OIL DO WHEN THEY ARE SITTING ON TOP OF A DEAD PLANET?**

Men come and go. Mother Nature survives. Leave the Everglades alone, Mother Nature knows what she's doing.

Sincerely,

Guana Howard
1332 SW 49th Ave.
Ft. Lauderdale, FL 33317



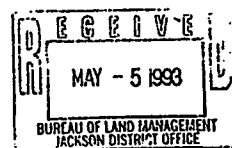
I-167

May 2, 1993

Robt. V. Abbey-
Jackson, Ms.

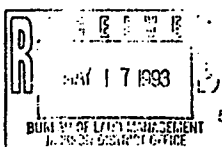
As a resident of Florida
I object to Shell Oil-
or any other company -
drilling in our Everglades.

The Army Corps did
enough damage with their
project years ago. More
harm than good came of
that project, as everyone
knows. Our state has
had enough of our environ-
ment destroyed by greedy
developers. No more.



Mrs. J. A. Hughes
3054 Merita Dr.
Holiday FL 34691

I-168



8352-4 Summerlin Road
Fort Myers, FL 33919

May 8, 1993

Bureau of Land Management
411 Briarwood, Suite 404
Jackson, MS 39206

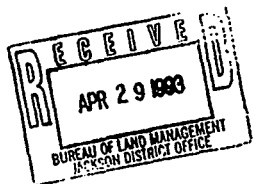
Gentlemen:

As a Florida citizen, I would like to register my strong support for the Draft Environmental Impact Statement on Shell's exploratory drilling plans on the Miccosukee Indian Reservation. It is my firm conviction that this type of work is essential to the future welfare of the State of Florida.

Very Truly yours

George G. Hughes
George G. Hughes

I-169



Robert Abbey
Bureau of Land Management
411 Briarwood Drive, Suite 404
Jackson, Mississippi 39206

April 22, 1993

Dear Mr. Abbey,

RE: Drilling of Exploratory Well by Shell Inc.
on the Miccosukee Indian Reservation
in Broward County

The nature of this letter is to inform you of my genuine concern with the risk involved in drilling in such an environmentally sensitive area. As a geology student at Broward Community College, my fellow students and I are continually keeping abreast of potential hazards that can endanger the South Florida ecosystem. On April 14, 1993 we attended the public hearing on this issue and we all concluded that this drilling should not be done.

The (DEIS) study did not take in account many topics which we in class had discussed. I am certain you have received numerous letters pertaining to this issue. So I won't bore you with environmentalist quibble.

I just would like to let you know that on this Earth Day April 22, 1993, are duty as denizens of this planet is the preservation of the Earth, not its depletion.

Yours truly,

Leonardo Iannone
Leonardo Iannone

I-170

320-A NW 7th Avenue
Pompano Beach, Florida 33060
(305) 537-3111

Friday, April 16, 1993

Jackson District Office
Bureau of Land Management
411 Briarwood Drive
Suite 404
Jackson, Miss. 39206

Dear Ladies and Gentlemen:

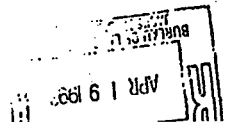
I would like to voice my concern of the Oil drilling in the Everglades. It's bad enough we have developed homes in these areas, slowly enveloping much of the natural historical significance of Florida. But when we begin to savagely rape our land for monetary gain, there will be a price to pay.

45 | Florida depends upon the everglades for fresh water, and if we jeopardize our supply of fresh water and put natural inhabitants at risk, our future children could regret something we could have prevented.

Please reconsider. There are other ways to discover and retrieve oil if it exist. We just have to find a way to discover it patiently, or another method of energy.

Sincerely,

Carlton Inman
Carlton Inman



I-171

DISTRICT MANAGER
BUREAU OF LAND MANAGEMENT
JACKSON MS-

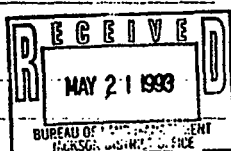
15 MAY 93

MR ABBEY-

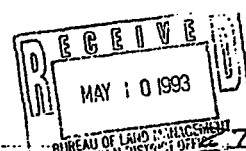
I WANT YOU TO DENY SHELL OIL THE
PERMIT TO DRILL EXPLORATORY WELLS
IN THE FLORIDA EVERGLADES

Reed M. Hill

Ree Island
P.O. Box 7657
St. Petersburg, FL
33734-7657 USA



I-172



BLM
JACKSON-39206
219 S1 AVE WEST
BRADENTON, FL 34207
5-5-93

GENTLEMEN

I WAS VERY PLEASED TO
READ IN A LOCAL PAPER, YOUR
OFFICE WILL PROBABLY APPROVE
THE DRILLING OF TESTING WELLS
FOR PETROLEUM OR GAS NEAR
THE TIP OF SOUTH FLORIDA.

OUR ECONOMY BACK NEEDS DOMESTIC
PRODUCED PETROLEUM AND THE JOBS
THAT POTENTIAL FINDING AND
REFINING CAN PRODUCE.

OUR BALANCE OF TRADE
IS IMPROVED BY EVERY GALLON
PRODUCED IN THE USA.

I AM CERTAIN YOUR
PEOPLE AND OTHER REGULATORS
WILL PROPERLY CONTROL SAFETY
AND THE ENVIRONMENT.

PLEASE ACT FAVORABLE ON
THIS APPLICATION AND OTHERS TO
AID OUR ECONOMY

Yours Truly Bill Iannone

I-173



Violet and Leo Isaacson
709 Woodlands Boulevard
Tamarac, Florida 33319

April 16, 1993

Dear Mr. Abbey,

I am writing to let you know that I am against allowing shell drilling - or any invasion - in the Everglades.

I have been a resident of Broward County for 25 years and have seen our land invaded by multi-corporations.

For their profit - not the for the "good of the people" -

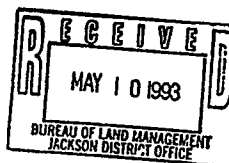
There is no shell drilling to occur -

Sincerely,
Violet Isaacson

Isaacson

I-174

I-175



PAUL G. JAMESON
MOUNTAIN LAKE
P. O. BOX 832
LAKE WALES, FLORIDA 33853
(813) 878-5231
May 7, 1993

Bureau of Land Management
411 Briarwood, Suite 404
Jackson, MS 39206

Gentlemen:

Energy drives our industries, transportation system and is the prime motivator of a vibrant economy. We need more domestic oil production and less imported oil, therefore I strongly support a proposal by Shell to drill a well in South Florida on the Miccosukee Indian Reservation. A draft of the environmental impact statement has been prepared for the Bureau of Land Management by Dames & Moore Consulting Company in Boca Raton, Florida.

I am writing to encourage you to support the conclusion of the environmental impact statement.

They state that the drilling of the proposed exploratory well could cause some short-term disturbance to components of the human and natural environments, but would not have significant impacts on water, air, vegetation, wetlands or wildlife. Measures to mitigate short-term disturbances are recommended in the document and would be implemented.

The potential effects of the exploratory well on water resources and wildlife appear to be the areas of the greatest public concern. Investigations indicate that important potable ground water sources, such as the Biscayne aquifer and sensitive water bodies, such as Water Conservation area 3A, are sufficiently protected by distance and physical barriers so as to be unaffected by the proposed drilling.

Additionally, ground water velocities in all of the aquifers are extremely slow, which would allow any ground water contamination to be effectively cleaned up in the very unlikely event that it should occur.

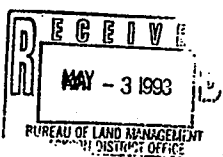
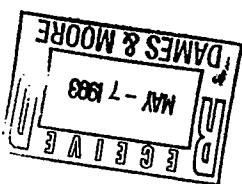
Wildlife investigations indicate that the well site does not support significant species or populations of wildlife, including endangered species such as the Florida panther and the Everglades snail kite.

to whom it may concern - 4/21/93

I have 2 small nieces that love the water & trees & creatures of our Florida Wildlife Areas. They are also addicted to drinking water. Please do not pollute our ~~water~~ water table.

Thank you

M. Carpenter-Jaquinta
254 SE 3rd Ave
Pompano Beach, FL



I-176

PAUL G. JAMESON
MOUNTAIN LAKE
P. O. BOX 852
LAKE WALES, FLORIDA 33853
(813) 876-5231

I understand it is the opinion of the Bureau of Land Management, in consultation with the Bureau of Indian Affairs, that the analysis presented shows that the proposed well by Shell with the recommended mitigation, complies with all applicable regulations and assures protection of natural resources and environmental quality.

I fully support this position and ask for your support on Shell's proposal to drill a well on the Miccosukee Indian Reservation.

Sincerely

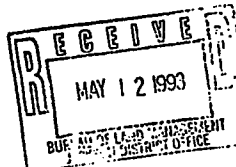
Paul G. Jameson
Paul G. Jameson

PGJ/pr

- 2 -

I-177

May 10, 1993



Robert V. Abbey, District Manager
Bureau of Land Management
411 Briarwood Drive, Suite 404
Jackson, MS 39206

Dear Mr. Abbey:

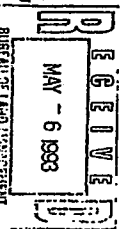
I understand that from now until November you will be deciding whether or not to issue Shell Oil a permit to drill an exploratory well in the Florida everglades. Even though the area is not within Everglades National Park, it is still in the "historic" everglades. Please deny the permit.

Sincerely,

Joan W. Jenrich
Joan W. Jenrich
PO Box 7251
St. Petersburg, FL 33734-7251

I-178

Dear Jackson District
Bureau of Land Management,
I'm writing because I'm very concerned about
Shell Oil Company might drill for oil in the everglades.
I found your address in the newspaper. In the
illustration it showed a water spring a few feet
away from where they are going to drill. I don't
think they should drill because our natural
resources are more important than making
money because you can't buy back natural and
natural resources. There's not a lot of them. It's
on the wall, but I guess people can't see them. There
are some. When the species is gone our whole
ecosystem will be devastated and the wildlife will
try to survive. Also one of the species will still disturb
the wildlife. Our world will be changed then people will
suffer. I hope you go your time.
Sincerely,
Laverne Amette Jewell



1906 N 31st.
Hollywood, FL
April 30, 93
33021

I-179

5-12-93

Dear Mr. Abbey,

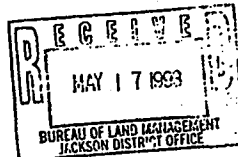
I have requested and read the Summary
DEIS regarding Shell Western E & P Ex-
ploratory Well in Broward County.

I support the conclusions of the DEIS,
i.e. there will be no significant
impact on water, wildlife, vegetation or
wetland.

I concur with the opinion of the
BLM that the analysis in the
DEIS shows the proposed action,
with recommended mitigation,
complies with all applicable
regulations and assures the
quality of both natural resources
and the environment.

Sincerely

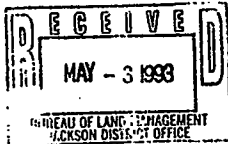
W.H. Jobe
W. H. JOBE
P. O. Box 11004
PENSACOLA, FLA 32524



I-180

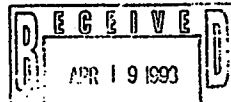
2024 NW 14 Ave
Jt. Land. J/
33311
04-28-93

Robert Abbey,
Bureau of Land Management
411 Briarwood Dr.
Suite 404.
Jt. MS.



Dear Sir,
It is of great concern of mine that you are even considering allowing Shell Oil to drill in the Everglades. I am sure you will agree with the fragile nature of the Everglades and its uniqueness. I urge you to do some more "objective" and independent study before coming to any decision. I know you will do what is best for our environment.
Yours truly,
Bevin John

I-181



April 15, 1993

Dear Sirs,

My father was a yepi, he roamed the Everglades for years. Someone once saw him near Rt. 27. My mother was from an Indian tribe long since gone from the Everglades. Surely you believe me if you believe Shell will not jeopardize the Everglades.

All the "accidents" that have happened the ship wrecks, the nuclear plants, the explosions, the radiation into the air, the toxic landfills - someone said it was safe - someone didn't plan, someone messed up. If Shell says they won't hurt the Everglades - when they do it will also be too late.

What about the trucks bringing in equipment? The dust, the fumes, the rumbling? The road wear?

What about the noise, the garbage, the waste, refuse and spills?

What about the killing of life?

What about the tremendous shock to the land, growth and water flow?

If this drilling can be done with no effect on the Everglades, no repercussions, - well, someone is telling us to believe in a thing that is not real.

I-182

Who will be next? What will be next? Where will your power be?

It is quite clear the developers are drilling over the Everglades - finding them to be a wetland no doubt was a blow, if only a temporary one. It is quite clear that money, greed will win out someday, it's a fact of life. Just hoped it would take longer, that I wouldn't live to see it.

If the Bureau tells Shell they can do this thing and something does go wrong - just another "oops" right?

Sincerely,
Corothy Johnson

P.S. You know also that Mother Nature will only take so much. If the people can't get through maybe she can.

I-183

PERRY W. JOHNSON
1314 PILGRIM AVE.
MELBOURNE, FLORIDA 32940

Bureau of Land Management
411 Briarwood, Suite 404
JACKSON, MS 39206

Gentlemen,

I am writing in support of the findings in the draft environmental impact statement on Shell's drilling plans on the Micosukee Indian Reservation in South Florida.

It appears that the exploratory well would have no significant impacts on water, air, vegetation, wetlands or wildlife. Further exploration for oil and natural gas in our state needs to be accomplished. Since such exploration can be done and comply with applicable regulations and assure protection of natural resource and environmental quality, I am in favor of it.

Sincerely,
Perry W. Johnson

I-184

Dear Mr. Abbey, 5/13/93
I understand that from now until November you will be deciding whether or not to issue Shell Oil a permit to drill an exploratory well in the Florida Everglades. Even though the area is not within Everglades National Park, it is still in the "historic" Everglades. Please deny the permit.

Sincerely,
Joan Johnston
RECEIVED
MAY 20 1993
BUREAU OF LAND MANAGEMENT
JACKSON DISTRICT OFFICE

I-185

RECEIVED
JUN 14 1993
BUREAU OF LAND MANAGEMENT
JACKSON DISTRICT OFFICE

June 7, 1993
Dear Mr. Abbey,
I understand that from now until November you will be deciding whether or not to issue Shell Oil a permit to drill an exploratory well in the Florida Everglades. Even though the area is not within the Everglades National Park, it is still in the "historic" Everglades.

PLEASE DENY THE PERMIT.
Sincerely,
Mr. G. Jones
PO Box 637
Fort Lauderdale, FL
33302-0637

Manager
must
be 404

SUPPORT
RE
N
JUN 9

I-186

Ans-R-Gram

FROM: FRANK H. JONES, JR.
3200 PAR ROAD
SEBRING, FL. 33872

TO: BUREAU OF LAND MANAGEMENT
411 BRIARWOOD, SUITE 404
JACKSON, MS 39206

URGENT ☐ ASAP ☐ NO REPLY ☐

DATE: 5-6-93
ATTENTION OF:

SUBJECT: SHELL OIL COMPANY -
DRILLING A WELL IN SOUTH
FLORIDA ON THE MICCOSUKEE
INDIAN RESERVATION

MESSAGE:
SINCE THE DRAFT ENVIRONMENTAL IMPACT STATEMENT
PREPARED BY DAMES AND MOORE CONSULTING CO REVEALS
NO ADVERSE ENVIRONMENTAL NOR NATURAL RESOURCES
IMPACT, I FAVOR A PROPOSAL BY SHELL OIL COMPANY
TO DRILL A WELL IN SOUTH FLORIDA ON THE
MICCOSUKEE INDIAN RESERVATION.
FURTHERMORE, I APPROVE PRUDENT DRILLING IN THE
UNITED STATES FOR BOTH ECONOMIC AND FOR OUR
NATIONAL SECURITY AND REDUCE OUR DEPENDENCY FOR
FOREIGN OIL.

REPLY: THANK YOU, SIGNED: Frank H. Jones, Jr.

RECEIVED
MAY 10 1993
BUREAU OF LAND MANAGEMENT
JACKSON DISTRICT OFFICE

Ans-R-Gram

I-187

Dear Mr. Abbey, 5/13/93
I am writing to let you know that I strongly oppose oil drilling in the Everglades. Specifically, the Draft Impact Statement for Miccosukee 3-1. In the 10 years I have lived in South Florida I have noticed the dramatic encroachment on the Everglades and thought that at this rate the development and degradation will take hardly anytime at this rate. I for one (among many) am not ready to lose any more of this precious and threatened land. It is a vital source for South Florida's water system not to mention a critical habitat for all types of wildlife. Look what happened at Prince William Sound and other sites of oil leaks. It's a disaster in the making. Please avert a calamity before it happens.
Sincerely,
SD

Let Shell drill in Hell

BY

ADRIAN AUMEN

Talk about outrageous.

With all the predictions about how much it's going to cost us to clean up the Everglades and the water wars that could divide South Florida, Shell Oil Company still wants to drill in the middle of the Everglades.

The very idea of poking more holes in the already ailing system and increasing risks to wildlife and water supplies is nothing short of arrogant.

So is Shell's attempt to "greenwash" the plan by presenting an Environmental Impact Statement that uses outdated maps and information. It only skims the surface of issues such as the effects on groundwater and future restoration plans.

The proposed drill site is at the edge of the Big Cypress National Preserve (located by the Collier/Broward line, north of Alligator Alley) and the world-renowned sawgrass marsh, a conservation area that keeps Broward and Dade counties from running out of water.

State rules prohibit direct drilling in the conservation area, so Shell came up with a way around it - by drilling at an angle. The drilling rig would be outside the conservation area, on land owned by the Miccosukee Indians (read: federal land). The end of the drill would be 4,700 feet east - smack dab in the conservation area, at 18,850 feet down.

Slick. The drilling rig would stand in a cattle pasture within 200 feet of a canal and only 1,000 feet from a pumping station that funnels water into the Everglades water catchment areas. Imagine what a hurricane could do with that setup. The area is also home to Florida

panthers, wood storks, Everglades kites, Everglades minks and, in the Shell study's own incriminating words, "other waterfowl" (sic).

Shell's tenacity would make you think it expects to find a pool of oil the size of Prince William Sound, but even the experts doubt there's much to be found. There's not much oil in Florida, and the oil that's here is of such poor quality that it's hardly worth refining.

Could it be worth losing the Everglades? Shell admits that, if it finds oil, it's likely to seek more drilling. It also admits that spills are inevitable.

Exxon and other firms drilling nearby have been unable to prevent spills. Almost 163,000 gallons of crude oil and 120,000 gallons of plant-killing brine already have been spilled in the Everglades area. Unchecked, one gallon of petroleum can contaminate one million gallons of drinking water.

That's why about 300 South Floridians, and even some tourists, crammed a recent public hearing in Broward County to talk with Washington bureaucrats on the issue.

"Tell Shell to drill in Hell!" yelled some folks. Others are cutting up their Shell credit cards and taking their business elsewhere. Not a bad idea.

What you can do Unless something changes, the U.S. Department of the Interior is expected to approve Shell's plans soon. Besides cutting up your Shell card and boycotting the stations, here's some folks you can write. Or just mail them this column.

Bruce Babbitt
Secretary of the Interior
1849 C Street, NW
Washington, D.C. 20240
(202) 208-7150

Carol Browner
U.S. Environmental
Protection Agency
401 M Street, SW
Washington, D.C. 20460
(202) 260-4700

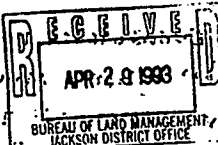
Robert V. Abbey
District manager of the
Bureau of Land Management
Jackson District Office
411 Briarwood Drive,
Suite 404
Jackson, MS 22203

EDITH L. KAPPLEN

RICHARD B. KAPPLEN

400 N.E. 8 STREET

POMPANO BEACH, FLORIDA



RE: SHELL OIL CONSERVATION OF

THE EVERGLADES

TO: BUREAU OF LAND MANAGEMENT, JACKSON DISTRICT OFFICE

FROM: EDITH L. KAPPLEN, RICHARD B. KAPPLEN, 400 N.E. 8 STREET, POMPANO BEACH, FLORIDA

SUBJECT: SHELL OIL CONSERVATION OF THE EVERGLADES

RE: SHELL OIL CONSERVATION OF THE EVERGLADES

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RE: SHELL OIL CONSERVATION OF THE EVERGLADES

RE: SHELL OIL CONSERVATION OF THE EVERGLADES

THEIR PROPOSED ACTIVITY.

THE IMPLICATIONS OF EVERGLADES DESTRUCTION IS ONE OF PERSONAL PERSUASION BECAUSE MANY FEEL DOES NOT MATTER — AND THAT BECAUSE OF THE LAST GREAT PLACES WOULD BE DESTROYED TO OFFER SHORT TERM EMPLOYMENT AND IMMEDIATE FINANCIAL REWARD TO THE PETRO-INDUSTRY.

IT IS TIME FOR THE PETRO-INDUSTRY REALIZES THAT A CHANGING WORLD WITH QUANTUM POPULATION GROWTH DOES NOT ALLOW THEM TO DO BUSINESS AS USUAL. THEY WOULD BETTER TO USE THEIR POLITICAL AND ECONOMIC CLOUT TO DEVELOPE RENEWABLE ENERGY SOURCES: ALCOHOL FROM SUGAR, MILK, OR RAPSEED CROPS. FOSIL FUELS ARE THE NEARLY EXIST TO HUMANITY AT RETRIEVAL OF FOSIL FUELS MUST BE HIGH.

LET PLANTAIN RARE STOP AND LET IT BEGINS HERE.

RESPECTFULLY,

Edith L. Kappelen

Richard B. Kappelen

400 N.E. 8 STREET, POMPANO BEACH, FLORIDA

RE: SHELL OIL CONSERVATION OF THE EVERGLADES

RE: SHELL OIL CONSERVATION OF THE EVERGLADES

RE: SHELL OIL CONSERVATION OF THE EVERGLADES

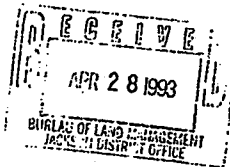
RE: SHELL OIL CONSERVATION OF THE EVERGLADES

I-191

4.23.93

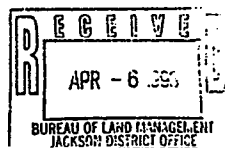
Dear Sir -

Let's Not Kid Each Other -
EXPLORATORY DRILLING BY SHELL IN
THE FLORIDA EVERGLADES MEANS YOU
PLAN TO DRILL SOON - AFTER ALL,
WHY ELSE WOULD YOU MAKE ALL
THOSE GENEROUS CONTRIBUTIONS TO
OUR COMMISSIONERS, AS LONG AS
THE DOLLARS FLOW IN TO SHELL,
THE WATER SUPPLY BE DAMNED.
I HOPE YOU DON'T SLEEP NIGHTS.
I LIVE IN A 300 APT. CONDO,
AND THE WORD IS GETTING
AROUND TO BOYCOTT SHELL!



Mr. Katz

I-192



Dear District Manager:

I am a concerned South Florida resident asking you to please stop Shell Oil Co. from exploratory drilling in the eastern Everglades.

May I remind you that this is a CONSERVATION area, where our fragile environment is supposed to be PROTECTED, not threatened by a company whose only purpose is to make a profit at the expense of our main source of fresh water.

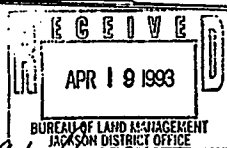
I am vehemently opposed to this drilling, and will do everything in my power to see that it is stopped.

Thank you for your time.

Howard Katzman
Howard Katzman

I-193

4-16-93



To Whom It May Concern,
I am writing you this letter to give
you my opinion on the subject of drilling.
First of all, I think this plan
to drill in the Everglades is crazy!
It makes no sense to me why people
cannot just leave things alone and
let them work for us. The Everglades is one
of Florida's most important resources,
why would anyone want to risk
losing it? For what, another dollar?
What will I have to tell my
children and grandchildren when
they ask me why there are no
more animals to look at, except
in a library book? To me that
is not fair.
Someone is making a decision
for a person who does not have
the chance to decide for them-
selves yet.

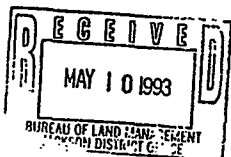
I-194

That is really all that I wanted
to know. I really hope that some-
one knows what they're doing
in this situation and that you
make the right decision for all of
us.

Thank you.
A concerned 19 year old,
Sheera Kelley
and Mom

I-195

BLM
411 Briarwood
Suite 404
Jackson, MS 39206



May 7, 1993

Dear Sirs:

I would like to add my voice to the approval regarding a proposal by Shell Oil Company to drill a well in South Florida on the Miccosukee Indian Reservation in western Broward County.

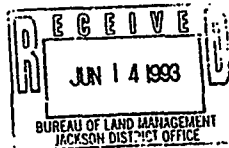
I support this project since it was in the opinion of the BLM, in consultation with the Bureau of Indian Affairs, "that the analysis presented in the DEIS (draft environmental impact statement) shows that the proposed action, with recommended mitigation, complies with all applicable regulations and assures protection of natural resources and environmental quality."

Shell Oil Company has always been in the forefront in preserving our natural resources and I wish them well.

Edward Kempa
Edward Kempa
182 Grand Cypress Ct.
Winter Haven, FL 33880-4876

I-196

June 11, 1993
403 Oakwood Court
Fern Park, FL 32730



Robert Abbey
Bureau of Land Management
411 Briarwood Drive, Suite 404
Jackson, Mississippi 39206

Dear Mr. Abbey,

I have read that Shell Oil has applied for a permit for exploratory drilling in the Everglades. This permit should not be granted.

Biologists and other scientists have expended large amounts of their own energy attempting to convince people that the Everglades are already in a state of decay and pollution. We have learned that draining them or parts of them is the wrong thing to do. Soon we will begin the first step in restoring the Everglades by returning the Kissimmee river to its natural flow. We learned that it was a mistake to channelize the river because it increased the amounts of nitrogen and phosphorus polluting lake Okeechobee and the Glades.

The Everglades act as a purification system for water which runs out to the Florida reef. I'm sure you are aware that the reef is in danger from pollution and therefore all the marine life which feeds there. The Everglades provide natural flood control in disasters such as hurricanes.

We need to restore the Everglades to their original condition not just because they provide habitat for endangered birds and diverse and undiscovered plant life. We need to save them because they are saving our own lives.

Please work to deny the Shell application. The least damage would be the relocation of a few more wild animals and the possible destruction of some unknown plant form. The worst that could happen would be the actual discovery of oil.

Florida is the perfect location to increase the use of direct solar energy and its related forms such as biomass. The University of Florida already has a biomass institute providing information about renewable energy conversion technologies. These are the technologies which should be encouraged and subsidized. Oil is now the inferior fuel. Please don't ask our last remaining natural purification system to work any harder.

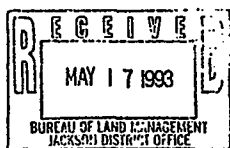
Yours truly,

Samuel Kendall
Samuel Kendall

I-197

May 12, 1993

B.L.M.
411 Briarwood
Suite 404
Jackson, MS 39206



I am writing to endorse Shell Oil Company's environmental impact statement in support of its proposal to drill a well in Southern Florida on the Miccosukee Indian Reservation.

I do not profess to be an expert on the environmental problems covered by the impact statement. However, as a retired Shell officer, I assure you that you can rely on the integrity of Shell's DEIS in support of this proposal.

While I was with Shell, we prided ourselves on our commitment to the environment. As I have followed Shell's progress since I retired, I have been impressed that Shell is even more so committed.

Once the environmental problems have been satisfied, finding new crude reserves, particularly land reserves, is of paramount importance to the national security and economic welfare of the country.

Sincerely,

William F. Kenney
William F. Kenney
1724 Wateredge Dr.
Naples, Fla.
Phone 813-566-1452

I-198

March 20, 1993

Mr. Robert V. Abbey
District Manager
Bureau of Land Management
411 Briarwood Drive, Suite 404
Jackson, Mississippi 39206

Dear Mr. Abbey,

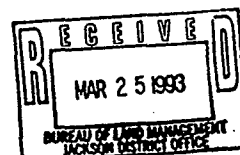
Thank you for providing me with a copy of the draft Environmental Impact Statement pertaining to the Miccosukee 3-1 Exploratory well. Personally, of the three proposed action alternatives, I prefer alternative C (East Access Route) because it involves the least environmental damage as far as I can tell. In the discussion of alternative C, the comment is made that FHWA is opposed to the use of this access route. Can you tell me what is the reason for their opposition?

Ideally, we should not be even considering oil wells so close to a natural treasure such as the Big Cypress National Preserve; however, I understand that the Miccosukee Indians have a right to develop the resources within their reservation. I hope and trust that the BLM and other governmental agencies involved in this project will vigorously seek to ensure that the "best management practices" mentioned a number of times in the EIS are meticulously followed.

Thank you again for the draft EIS. If possible, I would like to hear the outcome of the project. In particular, if significant oil is discovered, I would be very interested to know what the plans were for development of the oil field.

Sincerely,

Steven P. Kent
Steven P. Kent
1171 NW 133rd Terrace
Sunrise, FL 33323



I-199

Handwritten letter from the Bureau of Land Management, dated 1/8/93, addressed to the Washington D.C. 20240. The letter discusses the Everglades and the impact of the water supply system on the people, the climate, and the ecosystem. It mentions the need for a new water supply system and the importance of the Everglades. The letter is signed by the Director of the Bureau of Land Management.

I-200

DEAR BUREAU OF LAND MANAGEMENT,

"... THAT EXCLUDES ALLOWING THE EXPLORATORY WELL WOULD HAVE ONLY A MINOR ENVIRONMENTAL IMPACT." WELL SIRS AND ~~THE~~ MRS.'S HOW MANY MINOR ENVIRONMENTAL IMPACTS CAN OUR EARTH WITHSTAND. MANY MINORS EVENTUALLY BECOME A WHOLE MAJOR.

ISN'T IT TRUE THAT OUR EVERGLADES IS A ~~MAJOR~~ ENDANGERED AREA. WELL WITH WOULD ANYONE WANT TO ENDANGER IT MORE.

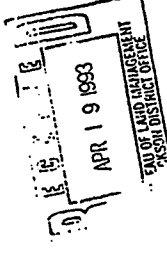
THE FUTURE OF OUR CHILDREN, GRANDCHILDREN ETC... PLANT AND ANIMAL LIFE IS AT RISK. WHETHER MINOR OR MAJOR IMPACT IT DOES NOT MATTER.

PLEASE DO NOT ALLOW EXPERIMENTAL DRILLING IN THE PRECIOUS EVERGLADES.

THANK-YOU

[Signature]

DANN R. KEO

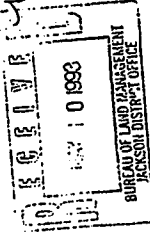


I-201

We the People of Florida do NOT want shall oil drilling in any part of our Everglades.

Thank you

Hope C. Kimbrell



I-202

4300 N. Ocean Blvd.
Apt 11C
Fort Lauderdale, FL 33308

Bureau of Land Management

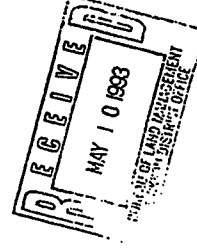
Re: Statement:

As an interested citizen, I have reviewed the DEES regarding the proposed by Shell oil Co. to drill a well in South Florida on the Hecate River Basin.

In my opinion, there is no reason to deny the request and I hope you will arrange to approve it.

Sincerely,

Donell H. King



I-203

Brian F. Kingston
104 N.E. 16th. Ave., #6
Ft. Lauderdale, Fl 33301

April 28, 1993

Mr. Robert Abbey
District Manager
Bureau of Land Management
Jackson District Office
411 Briarwood Drive, Suite 404
Jackson, Mississippi 39206

Dear Mr. Abbey:

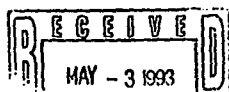
After reading the Environmental Impact Statement by Dames and Moore and attending the public hearing at the Greater Fort Lauderdale-Broward County Convention Center, I would have to say that the only choice from the alternatives available is the "No Action Alternative."

My major concerns are the pollution of the waters, both the drinking water and the seaway. The crude leaving via Port Everglades to refineries would increasing the chances of an accident in our ocean. This ecological nightmare will affect everyone.

I think we should ask ourselves, is it morally right to allow a few individuals to prosper when so many others may be harmed?

Sincerely

Brian F. Kingston



U.S. DEPARTMENT OF LAND MANAGEMENT

I-204

Jackson District Office
Bureau of Land Management
411 Briarwood Drive
Suite 404
Jackson, Mississippi 39206

To whom it may concern:

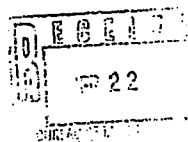
As a south Floridian who values the environmentally sensitive Everglades, I am adamantly opposed to Shell Oil's plans to drill for petroleum there. No number of precautions can assure that contamination will not eventually occur, due either to a natural or human-induced disaster. I urge you to make all efforts to thwart Shell's plans to exploit the Everglades. . . before it is too late for our wildlife, our economy, our water supply, and the preservation of the unique and natural beauty of the Everglades.

Very Concerned,

George A. Kitchen
GEORGE A. KITCHEN
7300 N.W. 16 ST.
PLANTATION FL. 33313

I-205

Jackson District Office
Bureau of Land Management
411 Briarwood Drive
Suite 404
Jackson, Mississippi 39206



To whom it may concern:

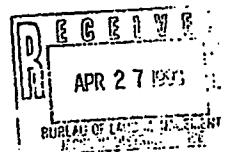
As a south Floridian who values the environmentally sensitive Everglades, I am adamantly opposed to Shell Oil's plans to drill for petroleum there. No number of precautions can assure that contamination will not eventually occur, due either to a natural or human-induced disaster. I urge you to make all efforts to thwart Shell's plans to exploit the Everglades. . . before it is too late for our wildlife, our economy, our water supply, and the preservation of the unique and natural beauty of the Everglades.

Very Concerned,

Karen Klein
Karen Klein

I-206

Jackson District Office
Bureau of Land Management
411 Briarwood Drive
Suite 404
Jackson, Mississippi 39206



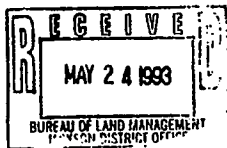
To whom it may concern:

As a south Floridian who values the environmentally sensitive Everglades, I am adamantly opposed to Shell Oil's plans to drill for petroleum there. No number of precautions can assure that contamination will not eventually occur, due either to a natural or human-induced disaster. I urge you to make all efforts to thwart Shell's plans to exploit the Everglades. . . before it is too late for our wildlife, our economy, our water supply, and the preservation of the unique and natural beauty of the Everglades.

Very Concerned,

Michael Klein
Michael Klein

I-207



557 Warwick Court
Venice, FL 34293
May 17, 1993

BLM
411 Briarwood
Suite 404
Jackson MS 39206

Dear Sirs:

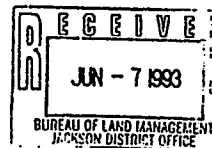
Please include me with those who support the findings in the draft environmental impact statement on Shell's drilling plans on the Miccosukee Indian Reservation.

Very truly yours,

Florence R. Knice

Florence R. Knice

I-208



12245 Crewe Street
North Hollywood, CA 91605

June 1, 1993

Robert V. Abbey, District Manager
Bureau of Land Management
411 Briarwood Drive, Suite 404
Jackson, MS 39206

Dear Mr. Abbey:

We understand that from now until November you will be deciding whether or not to issue Shell Oil a permit to drill an exploratory well in the Florida everglades. Even though the area is not within Everglades National Park, it is still in the "historic" everglades.

We urge you to deny the permit.

Very truly yours,

Mr. and Mrs. Milton Knopoff

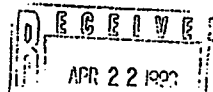
Mr. and Mrs. Milton Knopoff

I-209

Dear Mr. Abbey: Aug. 14, 1993
I have read that from now until November you will be deciding whether or not to issue Shell Oil a permit to drill an exploratory well in the Florida everglades. Even though the area is not within Everglades National Park, it is still in the "historic" everglades. Please deny the permit. Sincerely, Heidi

I-210

LIZ KNOWLES
7194 Woodmont Way
Tamarac, FL 33321



April 17, 1993

Jackson District Office
Bureau of Land Management
411 Briarwood Drive
Suite 404
Jackson, Miss. 39206

Dear Sir:

I am writing to protest Shell's plans to drill for oil in the Everglades.

I have been a customer of Shell since 1982. My charge bills for gasoline average \$100 a month. I have written to the president of Shell indicating that I will keep my account open but stop buying Shell gasoline until I hear the decision. If Shell is allowed to drill in the Everglades then I will close the account.

I feel that the Everglades has taken a serious enough beating with the expansion of the human population in south Florida. Then it was dealt a further blow with poor water management. Oil drilling is the worst possible scenario yet. Your bureau should be ashamed for even considering it based on our current knowledge of areas where this has already been tried. When the Everglades is destroyed and the balance of nature in the Everglades is destroyed - all of Florida will suffer.

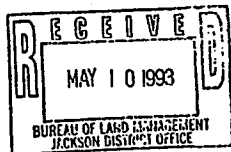
Sincerely,

Elizabeth A. Knowles

Elizabeth A. Knowles

I-211

I-212



May 6, '93

Dear Sir -

The ENVIRONMENTAL IMPACT STATEMENT
PREPARED BY DAMES & MOORE CONSULTING
CO. FOR BLM INDICATES THAT ALL REGULATIONS
ARE COMPLIED WITH AND NATURAL RESOURCES
WILL BE PROTECTED.

I, THEREFORE, AM IN FAVOR OF
SHELL OIL DRILLING AN EXPLORATORY WELL
IN WESTERN BROWARD COUNTY.

Kind Regards,

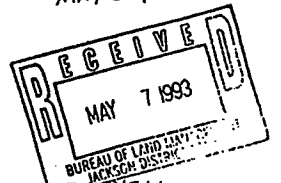
Ray A. Kralis
5211 Medalist Rd.
Sarasota, FL 34243

Ray A. Kralis

Kralis

520 WHITE CAP COVE COURT
DEBARY, FL 32713

MAY 04, 1993



BUREAU OF LAND MANAGEMENT
411 BRIARWOOD, SUITE 404
JACKSON, MS. 39206

REFERENCE: SHELL OIL CO. EXPLORATORY WELL
MICCOSUKEE INDIAN RESERVATION
BROWARD COUNTY, FL.

MANAGEMENT REVIEW BOARD:

HAVING READ THE INFORMATION CONTAINED IN THE
ENVIRONMENTAL IMPACT STATEMENT (DEIS), AS PREPARED
BY DAMES AND MOORE CONSULTING CO., BOCA RATON, FL.,
CONCERNING THE SUBJECT PROPOSAL, I COMMENT AS
FOLLOWS.

AS A CIVIL ENGINEER DESIGNING AND DEVELOPING
VARIOUS PETROLEUM FACILITIES IN THE USA FROM 1947
THRU 1981, AND IN PARTICULAR IN SOUTH FLORIDA FROM
1981 THRU 1985, I AM QUITE FAMILAR WITH THE REGULATIONS
AND RESPONSIBILITIES COVERING WATER, AIR, VEGETATION,
WETLANDS AND WILDLIFE, INCLUDING COMPONENTS OF THE
HUMAN AND NATURAL ENVIRONMENT AND RELATED CONCERNS.

THE REPORT OF (DEIS) FURTHER STATES THAT GROUND
WATER CONSERVATION AND WILDLIFE, INCLUDING ENDANGERED
SPECIES WILL NOT BE EXPOSED OR THREATENED.

SHELL OIL COMPANY HAS AN ENVIABLE RECORD FOR EXTREME
EFFICIENCY AND CONCERN FOR ENVIRONMENTAL CONCERN OF
NATURAL RESOURCES AND RIGHTS OF OTHERS.

THE (BLM) IN CONSULTATION WITH THE BUREAU OF INDIAN
AFFAIRS IN SUPPORT OF THIS PROPOSAL WILL INSURE PROTECTION
OF ALL RIGHTS AND PROVIDE MANY BENEFITS TO ALL CONCERNED.

I THEREFORE FULLY SUPPORT THE SHELL OIL COMPANY PROP-
OSAL TO DRILL AN EXPLORATORY WELL AND RECOMMEND YOUR
APPROVAL AND ISSUANCE OF THE PERMIT ACCORDINGLY.

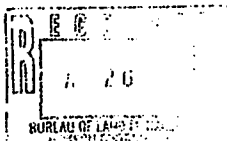
SINCERELY,
Richard P. Kulow
RICHARD P. KULOW

I-213

I-214

Mrs. Lois M. Lacoste
2431 Everglades Drive
Miramar, FL 33023

April 23, 1993



Jackson District Office
Bureau of Land Management
411 Briarwood Drive - Suite 404
Jackson, Miss. 39206

Gentlemen:

I have been a resident of South Florida for 30 years and my husband is a
native Floridian of 46 years. We are appalled that you would even consider the
thought of drilling in our precious Everglades! But, of course, huge corporations
and beauracratc departments always make their decisions based on the "all mighty
dollar", not what is best for mankind and the environment.

The U.S. Bureau of Land Management agency officials should have their heads
examined for even thinking of allowing Shell Oil to drill for petroleum in the
Everglades!

If petroleum is found, we all know Shell will sink more wells, increasing the
chance of a spill into South Florida's drinking water supply!

Slapping Shell with huge fines or the astronomical cost of a clean-up does
not prevent the damage that is done and the years to recover. Our water supply
is already in jeopardy by overpopulation and too far reaching western growth.
This deal with Shell will be devastating to the people of South Florida no matter
what precautions are taken. One error is all it takes and it doesn't help to say
"I'm sorry, we were wrong," the damage has already been done!

Listen to the residents of South Florida for once, instead of the big
corporations. Uncap the existing wells in Texas and leave the Everglades alone!
The Corp of Engineers have screwed up the ecology of the Everglades bad enough,
without now adding oil spills to the problem!

Sincerely,

Lois M. Lacoste

Lois M. Lacoste

Jackson District Office
Bureau of Land Management
411 Briarwood Drive
Suite 404
Jackson, Mississippi 39206

To whom it may concern:

As a south Floridian who values the environmentally sensitive
Everglades, I am adamantly opposed to Shell Oil's plans to drill
for petroleum there. No number of precautions can assure that
contamination will not eventually occur, due either to a natural or
human-induced disaster. I urge you to make all efforts to thwart
Shell's plans to exploit the Everglades. . . before it is too late
for our wildlife, our economy, our water supply, and the
preservation of the unique and natural beauty of the Everglades.

Very Concerned,

Robert A. Hickey

25

I-215

Re: drilling in Everglades April 20, 1993.
To Whom it may concern: This is to inform you that I am opposed to any exploratory drilling in the Everglades. I know you share my concern for this area that has already been taxed by population growth, increased water demands, and sugar cane industry. This fragile ecosystem does not need further strain. Please respond. Thank you.
Dancy Janzi: 2023 May 1st
Hollywood, FL 33020

I-216

Dear Mr. Abbey:
Please do not allow the Shell Oil Company or anyone else to drill in or near the Florida Everglades. As a Floridian and a U.S. taxpayer I protest any type of tampering with an already battered eco-system. We cannot afford to expose South Florida to any risks of its environment, economy and its water supply. Please protect our Everglades. - Thank you.

Sincerely -
Gail Larkin
6879 Bridlewood Ct
Boca Raton, FL 33433

I-217

P.S. Please send me a response! 5-14-93

To whom it may concern:

The proposal to allow Shell Oil Company to drill for petroleum in the Everglades is unacceptably dangerous. Doing so would expose the fragile ecosystem of the Everglades to further damage and put my source of drinking water at risk. I strongly urge you to refuse this proposal and any other oil drilling proposals, and support solar and wind ~~alternatives~~ alternatives!

Ms. Larson
9031 SW 48 St.
Cooper City, FL 33028

I-218

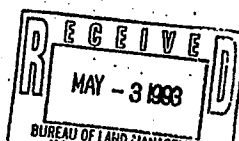
Maggie B. Lee
61 North Highlands Drive
Hollywood, Florida 33021

Robert Abbey
Bureau Land Management
411 Briarwood Drive, Suite 404
Jackson, Mississippi 39206

Dear Mr. Abbey,
I am writing in reference to the April 14, 1993 Public Hearing on drilling for oil in the Florida Everglades. As a college student in Florida I enjoy the beaches, reef and state and national parks. I am very concerned with the future of these areas, especially in light of the recent proposal to drill in the Everglades. Although I can see that there are positive factors involved also, I do not see the benefits as long-term. The consequences of such drilling could be disastrous beyond repair. I hope that you will continue to keep in mind my opinion and the opinion of others who are against the Shell oil drilling proposal.

Thank you very much.

Sincerely,
Maggie Lee



I-219

I-220

Handwritten: Please do not support request to drill for oil in the Everglades. Thank you. Michele LeFevre

RECEIVED
JUL 1 1993
BUREAU OF LAND MANAGEMENT
JACKSON DISTRICT OFFICE

6661
NAT 92
JUL 1 1993
JACKSON, MISSISSIPPI

Please do not support request to drill for oil in the Everglades. Thank you. Michele LeFevre

RECEIVED
MAY 17 1993
BUREAU OF LAND MANAGEMENT
JACKSON DISTRICT OFFICE

171 Wynnhaven Beach Road
Mary Esther, FL 32569
May 12, 1993

Bureau of Land Management
411 Briarwood
Suite 404
Jackson, MS 39206

Re: Shell proposed exploratory well, Miccosukee Indian Reservation, Broward County, Florida

Dear Sirs:

I would like to submit the following comments for your consideration relative to the proposed exploratory well.

It is my understanding that the DEIS prepared by Dames and Moore Consulting Co. indicates that even though the drilling would cause some short term disturbances to components of the human and natural environments, the proposed exploratory well would not have significant impacts on water, air, vegetation, wetlands or wildlife.

Important potable groundwater sources, such as the Biscayne aquifer, and sensitive water bodies, such as Water Conservation Area 3A, appear to be sufficiently protected by distance and physical barriers. Further, the extremely slow groundwater velocities in all of the aquifers would permit effective clean-up in the event contamination should occur.

Investigation of wildlife indicates that the well site does not support significant populations or species of wildlife, including endangered species.

Approval of the proposed drilling will provide the means to determine whether we can increase our critically needed oil reserves without endangering or harming our equally important environment.

Your approval of the DEIS is recommended.

Sincerely yours,

Howard E. Lemaster
Howard E. Lemaster

HL931321.LET

I-221

I-222

Apr 20, 1993

Dear Mr. Abbey,

Please deny the Shell Oil Company a permit to drill for oil in the Everglades.

Not only is the proposed drilling site near water pipes (just above the pipes, I believe) but as you know the Everglades is a unique ecosystem which affects the water supply to millions of humans, animals, and wildlife. Thank you.

Deni LeVite, Hollywood, FL.

April 15, 1993

Jackson District Office
Bureau of Land Management
411 Briarwood Drive
Suite 404
Jackson, Miss 39206

RECEIVED
APR 23 1993
BUREAU OF LAND MANAGEMENT
JACKSON DISTRICT OFFICE

Dear Mr. Robert Abbey:

This letter is to make a strong protest against Shell Oil drilling in our precious everglades.

The everglades eco-system is fragile as it is, without Shell Oil and its major equipment wrecking the place and spilling oil into our drinking water.

Also, I'm reading about this for the first time in Thursday's April 15 edition of the Ft. Lauderdale Sun-Sentinel. How did Shell Oil manage to get so far along with their plan without more public meetings? And how could you even consider for one minute to go along with such a scheme?

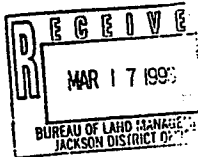
We need to have our everglades protected from any further damage, not exploited for Shell Oil's profit!

Please, I urge you Mr. Abbey, don't let any drilling go on in the beautiful Florida Everglades!

Sincerely,

Susan R. P. P.

I-223



Dear District Manager:

I am a concerned South Florida resident asking you to please stop Shell Oil Co. from exploratory drilling in the eastern Everglades.

May I remind you that this is a CONSERVATION area, where our fragile environment is supposed to be PROTECTED, not threatened by a company whose only purpose is to make a profit at the expense of our main source of fresh water.

I am vehemently opposed to this drilling, and will do everything in my power to see that it is stopped.

Thank you for your time.

ELSA LINDENFELD
4585 N. MICHIGAN AVE.
MIAMI BEACH, FL 33140

12 U-11.

I-224

MR. GEORGE H. LINK
439 MATAROS DR.
PUNTA GORDA, FL 33980

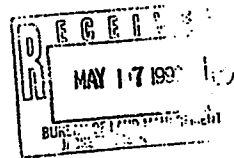
May 15, 1993

Dear Sir,
As a Shell proponent and concerned citizen I would like to state that I do support the conclusion of the DEIS to the proposal by Shell to drill a well in South Florida on the Miccosukee Indian Reservation in western Broward County.

It would seem that the results from this project would greatly outweigh (in the opposite) the negative messages that could be received.

Sincerely,

George H. Link



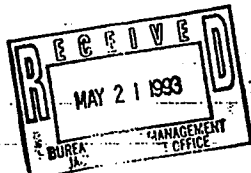
I-225

Dear Mr. Aday:

I understand that from now until November you will be deciding whether or not to issue Shell Oil a permit to drill an exploratory well in the Florida everglades. Even though the area is not within Everglades National Park, it is still in the "historic" everglades. Please deny the permit.

Sincerely,

Oscar Rod
6569 27th St. N
St. Petersburg, FL 33702



I-226

April 19, 1993

Rick Loss
9430 Tangerine Place, #105
Ft. Lauderdale, FL 33324

Jackson District Office
Bureau of Land Management
411 Briarwood Drive, Suite 404
Jackson, MS 39206

Dear Bureau:

The purpose of this letter is to inform you of my views regarding the permit to allow Shell Oil Company to drill for oil in the Florida Everglades (specifically Broward County).

I am very much opposed to their drilling. The everglades are a unique eco-system that is valuable to South Florida's environment, water supply, quality of life, and tourism. I think it is safe to say that there is only one Everglades and it should be preserved. With all of the recent accidents in drilling or transporting oil, I don't think it is safe for the Everglades. If there is any spill, we will have severely damaged one of our most valuable resources.

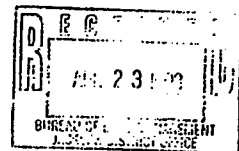
Our constant search for oil seems to be a narrow minded focus. It does not take into view the big picture. If we continue to search for oil at our present pace, we will have damaged every piece of wilderness in the world. Additionally, if our oil continues to be harvested and used our air quality will suffer severely. On top of all these negative effects, the oil supply will eventually be depleted. At that point what will we do? We will have a world with a damaged environment, polluted air, health problems, and no oil.

9 Can I suggest an alternative? We act now in finding alternative energy. We make drastic changes in the way we live unless we find energy alternatives that do not damage the environment. We assume that there are no new sources of oil and stop all new drilling. This will speed up the process of change. We create new possibilities for ourselves that allow us peacefully, co-exist with our environment. We eliminate the mentality of attacking the environment in the name of progress.

If we continue to drill we will never search for a true answer, we will only delay the inevitable. I hope that we act soon so that there is something left to save. Please stop all drilling in the Everglades or any other new drilling. We can't afford it.

Sincerely,

Rick Loss



I-227

May 1, 1993

District Manager
Bureau of Land Management
411 Briarwood, Suite 404
Jackson, Ms. 39206

Dear Sir:

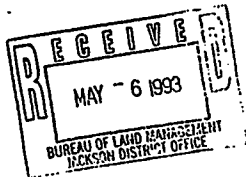
In April, 1991, I wrote your office encouraging support for Shell Oil Company's request for a permit to drill an exploratory well on the Niccosukee Indian Reservation near Interstate 75 in western Broward County. The response of your organization has been most gratifying and I do appreciate the efforts undertaken to keep me advised of the process as well as the progress in evaluating Shell's request.

It recently came to my attention that Dames and Moore Consulting Co. of Boca Raton has now issued a draft environmental impact statement supporting Shell's proposed action basis it complies with all applicable regulations and assures protection of natural resources and environmental quality. Shell has a proven track record of consistent positive impact in all activities of this nature. We all know that the Country needs additional reserves of this very important natural resource. When it can be done in an environmentally sound manner we should expedite the approval process. I trust the Bureau of Land Management will support the findings of the draft environmental impact statement and permit Shell to go forth with its drilling plans on the Niccosukee Indian reservation.

Sincerely,

Ronald N. Lyall
Ronald N. Lyall

1969 Oxford Drive
Sarasota, FL 34212



I-228

April 19, 93

Dear Mr. A. Wiley,

As a concerned citizen of Broward County, I am very interested in helping Shell Oil Company promote a hypothetical oil site on the Niccosukee Indian Reservation. Oil resources in the United States will help to improve the quality of life of every American citizen.

*Yours Truly,
Dottie Lyons*



I-229

604 S.W. 4th Street
Hallandale Beach
April 16, 1993

Jackson District Office
Bureau of Land Management
411 Briarwood Drive
Suite 404
Jackson, MISS. 39206

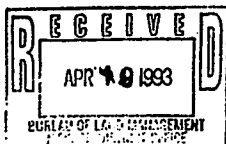
Gentlemen:

It has already been demonstrated that drilling in the Everglades was a dangerous undertaking in the Big Cypress Swamp. Was the oil spill cleaned up that time?

There is no such thing as a minor environmental impact when the delicate balance of our water is interfered with.

Too much damage has already been done! Keep out of the Everglades!

*Yours truly,
Josephine Marchese*



I-230

April 24, 1993

Jackson District Office
Bureau of Land Management
411 Briarwood Drive
Suite 404
Jackson, Mississippi 39206

Dear Sir/Madam,

South Florida has become a disaster area in regard to the wetlands.

We have a unique situation in South Florida since our fresh water supply is tied so directly to the wetlands and the Biscayne Aquifer. Over the years, diversions of water for various reasons, in addition to the proliferation of development, has succeeded in almost destroying our water quality and supply as well as large areas of the environment; flora, fauna and wildlife. These are statistical and indisputable facts.

If the government allows Shell Oil to test drill in this sensitive area, it will continue to exacerbate the destruction of this vital area. It is already a fact that the chances of finding any substantial amount of oil is slim. Why take the chance of further destruction?

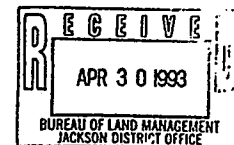
If Shell has such a compelling need for further exploration of potential sources of energy, why doesn't the government enact legislation that would encourage oil companies to utilize their time and resources in developing alternative sources of energy that would be more efficient and environmentally sensitive? Instead, continued drilling is allowed in many sensitive areas which increases the risks of "unplanned and unforeseen" oil disasters which cause irreparable ecological damage.

If this had been implemented 20 years ago after the oil embargo, we would not be continually engaged in efforts to protect our country's environment. Since it's doubtful that any legislation will be passed in the near future, we can only ask; why it is so difficult to understand that the environment is so very important and so directly intertwined with the well-being of humans and life as we know it? Continue abuse is deadly.

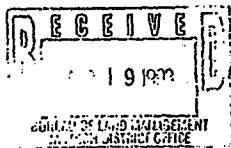
There must be some sane, intelligent, qualified people who can and will finally stop this potential for further disaster.

Yours truly,

Gloria R. McCluskey
Gloria R. McCluskey (Mrs. John F.)
2241 N. W. 82 Way
Boca Raton, FL 33424



I-231

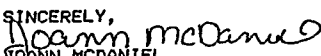


4/15/93

I WISH TO SPEAK OUR AGAINST THE SHELL DRILLING IN THE EVERGLADES, I AM 33 YEARS OLD AND BORN IN NAPLES FLORIDA. MY FAMILY AND I WERE BROUGHT UP IN THE EVERGLADES AND THE SEMINOLE INDIANS. THIS LAND IS SO PRESIOUS TO ME AND I HOPE ALL THE NATIVE FLORIDAINS. PLEASE TAKE TIME AND THINK ABOUT WHAT YOU ARE LETTING THIS COMPANY DO, AND HOW IT MIGHT RUIN THE GLADES IF A SPILL HAPPENS.

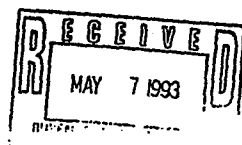
IF EVERYONE WOULD STOP THINKING ABOUT MAKING MONEY, AND TAKE A LITTLE TIME TO LOOK AT WHAT WE HAVE TO OFFER TO EVERYONE. AND LETS NOT FORGET THE DEER, AND THE OTHER WILD LIFE WHICH DEPENDS ON THE EVERGLADES TO SURVIVE.

I MIGHT NOT BE ABLE TO REALLY STATE IN WORDS WHAT I MEAN, AND I HAVE NEVER VOICED MY THOUGHTS CONCERNING ANYTHING BEFORE, BUT I CAN NOT STAND BY AND SEE THIS HAPPEN TO A WONDERFUL PLACE. AND IF SOMETHING WERE TO HAPPEN LIKE A SPILL THE GLADES WOULD NEVER BE THE SAME.

SINCERELY,

 JOANN MCDANIEL
 702 E RIVER DRIVE
 MARGATE, FLORIDA 33063

I-232

5300 Washington Street 214W
 Hollywood, Fl. 33021
 May 3, 1993



bureau of Land Management
 411 Briarwood, Suite 404
 Jackson, Ms. 39206

I am in support of the plan to drill for oil on the Miccosukee Indian Reservation in Western Broward County.

Would appreciate receiving a copy of the draft environmental impact statement prepared by James and Moore Consulting Co.

Thank you very much.

Very truly yours,


 Robert E. Mc Donnell

I-233

Stephen G. McKenzie
 1291 NE 2nd Street
 Pompano Beach
 Florida 33060

April 26, 1993

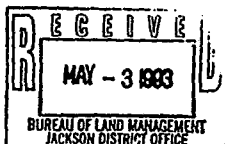
Jackson District Office
 Bureau of Land Management
 411 Briarwood Drive
 Suite 404
 Jackson, Mississippi 39206

re: The consideration of issuance of a "permit to drill" for an exploratory well to Shell Western E&P Inc.

To: The attention of Mr. Robert V. Abbey, District Manager, Bureau of Land Management

Dear Sir,

I am a citizen, and resident of south Florida, and ns many other residents, I have migrated to Florida from elsewhere. I am both a consumer of petro-chemical products, and water. I am for the exploration of new sources of energy, and independence of the United States reliance on foreign energy resources. I am also for the, safe protection of the vital resources of the United States, and the safe protection of those resources ns mandated by the people who have put a government in place to protect property and quality of life as the duty of that government. The Duty of the government to guard, and protect the resources of the United States is primary, whether the resource is oil or water or wood. I attended the hearing on April 14th at the Broward convention center. I came with an open mind on the subject, and was thankful that the opportunity and exposure to the planned permit was made available for public scrutiny. I thank you for your patience through the emotional presentations, and hope that you were able to come away with some new ideas, and to review the possible granting of a permit in an area which could threaten the water resource of millions of residents. The Environmental Impact Statement uses



I-234

26 1978 USGS. maps and charts to define the drill site. The age of the source documents for the study shows either a lack of understanding of south Florida water management or possibly, an under estimation of the intelligence of the residents, citizens, and tax-payers. I came to Florida from Venezuela in 1977, I do not under estimate the ability of the oil industry; I've seen a nationalized oil industry at work! In my first year in Florida, I was informed of a strain that the growing population of new residents were putting on Florida's limited water resource, and that such projected demands would lead to rationing.

45 This has already come to pass. The added burden of a threat to water resources needs to be considered. In the EIS, there are no references to the future intentions of Shell Western. Surely, they are not only interested in one or a dozen wells around the aquifer. It's unfortunate that they did not represent themselves at the hearing. They have left many points open to speculation. If drilling permits are granted, the government must consider the consequences of the potential damage and the restoration of the resources to supply the water needed to the area.

The damage to the water resource would result in one or several of many negative reactions to south Florida's population:

1. Building of a pipeline for drinking water to be piped in from Georgia.
2. The depopulation of South Florida due to exorbitant costs of water and utilities.
3. The exodus of industry (except the petroleum industry).
4. The destruction of plants and wildlife.
5. The loss of a unique, pristine ecosystem.

I-235

I-236

6. The dependence on desalinization plants for water.
7. The loss of tourism.
8. Florida could become a barren wasteland of oil tankers and derricks.
9. Visitors could enjoy the sunsets from their deck chairs on cruise ships which are independent of external water and power supplies.

Shell Western is willing to take the risk. If they fail, they have an exploratory tax write off—actual losers are the U.S. Government, and the U.S. tax payer.

As a citizen and resident, I cannot see a case (for drilling) in any of the documents presented that is viable, considering the risks to the population involved in the ecosystem. Please continue your good work, and good judgement, and carry out the mandate of the people which is to protect the quality of life from those who would put that quality of life in jeopardy, risking it for whatever reason, with ill regard for all lifeforms that may be negatively effected by their seemingly single minded self interest.

Sincerely

Stephen G. McKenzie
Stephen G. McKenzie

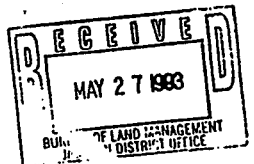
cc: Al Gore, Vice President, The United States of America
K. Michael Stumpe, Dept. of Science, Geology, Broward College.

*Chenard,
Shunk Oak, Ky
10088
May 22*

Dear Mr. Abbey,

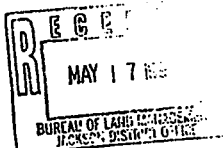
Please do not allow drilling in the Florida everglades. I understand oil companies wish to have a permit to drill wells in that area. I feel this part of the country should be sacrosanct. Thank you for your attention to this viewpoint.

*Sincerely,
Glenn Mack*



I-237

I-238



3009 Whirlaway Trail
Tallahassee, FL 32308
May 13, 1993

Bureau of Land Management
411 Briarwood, Suite 404
Jackson, MS 39206

Gentlemen:

I am writing in support of a proposal by Shell Oil Co. to drill a well in south Florida, in Broward Co., on the Miccosukee Indian Reservation.

From what I have seen, the draft environmental impact statement by Dames and Moore indicates that the well would have little negative effect on the area.

Please let me add two personal observations:

I worked for Shell as a professional geologist for 23 years. During this time, I found Shell people to be greatly concerned with the environment. Most loved the outdoors, and wanted operations conducted in such a way as to maintain it. Shell prided itself on being a "good neighbor."

Since my retirement back to Florida--after an absence of over 25 years--I find a new breed of people here styling themselves as environmentalists. Such people seem to have an opposition to all drilling, based on emotion, rather than any consideration of the facts available. This disturbs me, for such decisions should be made on the basis of facts, not emotion.

Sincerely,

John Malloy
John Malloy

CHET & MARILYN MARKOT
4955 PEPPER CIRCLE Apt. B-208
NAPLES, FLORIDA 33962-4105
1-813-793-2110

May 9, 1993

Bureau of Land Management
411 Briarwood, Suite 404
Jackson, MS. 39206

Gentlemen:

We have had an opportunity to review the summary document that was sent to us about environmental concerns relating to the Shell Oil Company proposal to drill an exploratory well on the Miccosukee Indian Reservation in South Florida.

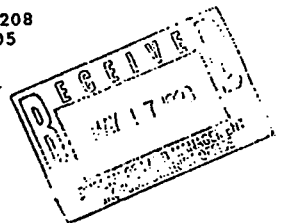
After thorough study of the draft environmental impact statement prepared by Dames and Moore Consulting Co., We could not see that there would be any deleterious effect upon the environment in that area by the proposed drilling program. We therefore support the application for drilling.

Further, we believe that any economic benefit derived from such activity is to the good of the residents on the reservation, and can only enhance their living standard, as well as provide them with a secure source of income should the discovery well prove to be commercially feasible, as well as help our national goal for self sufficiency in energy.

Very truly yours,

C.P. Markot
C.P. Markot

M.L. Markot
M.L. Markot



I-239

Jackson District Office
Bureau of Land Management
411 Briarwood Drive
Suite 404
Jackson, Mississippi 39206

To whom it may concern:

As a south Floridian who values the environmentally sensitive Everglades, I am adamantly opposed to Shell Oil's plans to drill for petroleum there. No number of precautions can assure that contamination will not eventually occur, due either to a natural or human-induced disaster. I urge you to make all efforts to thwart Shell's plans to exploit the Everglades. . . before it is too late for our wildlife, our economy, our water supply, and the preservation of the unique and natural beauty of the Everglades.

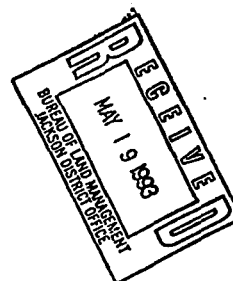
Very Concerned,

John Mathews

I-240

April 22, 1993

Robert Abbey,
Bureau of Land Management,
Broward County,
St. Lauderdale, FL



Mr. Abbey:

I am an experienced rotary drilling rig Driller/roughneck looking for a job drilling a oil or gas well.

I understand that Shell Oil Company is going to drill a wildcat well in Broward County.

If you would be so kind as to forward to me the name and address and phone number of the Shell official in charge of the Broward County oilwell so that I can get in touch with them so as to hire out; I would greatly appreciate it.

Thanks a million!

Sincerely,

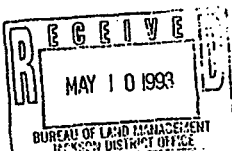
Jack Mathews
Jack Mathews,
807 Foster St.,
Morton, IL 62458-1866
Phone: 618-783-3971

jm/pdq

I-241

5979 NW 25th Street
Sunrise, FL 33313
5/4/93

Mr. Robert Abbey
District Manager
Bureau of Land Management
411 Briarwood Dr. Suite 404
Jacksonville, Miss. 39206.
Dear Sir,



It is out of grave concern for the preservation of the ecology of the State of Florida that I write relative to the planned drilling for oil in the Everglades by the Shell Oil Company.

Our ecology is the life blood of the state's economy and it would be a tragedy to have an occurrence similar to the Valdes oil spill happening here. I am aware of the fact that oil is the main stay of the engines of the world and that until the alternative is found we will continue to need it. If it is not drilled for here the fact is too, it will be drilled for somewhere in the world with the same possibility of adverse effects. The fact is however, I live here, my family lives here, if I should therefore sit idly by and not voice my concern then I would be as guilty as anyone else if something undesirable happens.

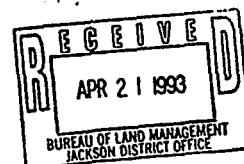
In other words I am not against drilling but I am very concerned since my information of the document detailing the plans for drilling does not address the subject of safety and precautionary measures to be taken. Hoping that my concern will be given attention, I am
Yours truly
John Mathews

I-242

To whom it may concern:
NO drilling in EVERGLADES!!!

We need clean water, and our resource for wildlife, not for profit by SHELL OIL.

Anne Maurer
6145 Balboa Circle # 305
Boca Raton, Fla. 33433

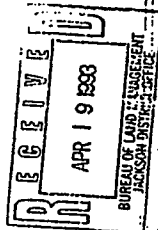


I-243

April 15, 1993

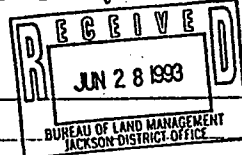
I read the article in Thursday paper about digging a well in our Everglades. We don't want you people messing up our land. You can't guarantee anything about safety to our birds and animals and fresh water. You people have messed up a lot of land. You have oil in Calif, Texas, OK and you all buy oil cheaper in United Arab Republic and make our people here hold on to theirs, and for what? Money for your self's. Why would some tiny agree to let you shell people in to their land to fool around mess up their home destroy the beauty. Money. Most everyone of us we live for our land, what's left of it. Please stay out of our Everglades. You come to kill our things.

Cherie K. Mazzenga



I-244

June 29, 1993



To Mr. Robert V. Abbey
District Manager
Bureau of Land Management
411 Briarwood Drive Suite 404
Jackson, MS 39206

Recently, it has come to my attention that there is a request from Shell Oil to obtain a well permit intended to drill beneath the Everglades Conservation Area #3A in search of oil. This is very disturbing to myself, and many of my friends and relations, because we have already witnessed firsthand the destruction that can come to a wilderness or sensitive ecosystem with the implementation of even the slightest amount of disturbance. I lived in the Florida Keys in 1979. Less than 15 years later I know the tragedy of too many people, and too much development in this (over).

I-245

Area. Most of the fish are gone - the gulf is no longer thriving with life. In fact it has been so devastated. Just by overpopulation - boats - fishermen - that it is a proverbial dessert (SP?) out there. No coral, no urchins, no life, just some barracuda and sharks. This could have been avoided, by education and some planning. Now Key West is using injection wells - that directly contaminate the water, and ground to be further. This is bad enough. Now we have a chance to say 'NO' to this drilling. Let's say 'NO' don't destroy the only link to life left for FLA. the everglades is our #1 resource as water for wildlife and also state - It has been severely threatened already by covering it up and building on top of the precious ecosystem. Please save our only last hope for Florida's growth. Oil and water Don't MIX.

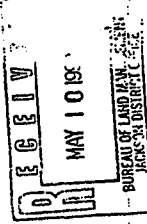
I-246

We are truly concerned citizens of these United States of America. We need to remain proud of our Country - and the first step is our care of natural resources.

Your voters,
Lynne A. Meder
40 marina
7601 E. Treasure Dr.
N. Bay Village, FLA.
33141

Florida has always opposed any type of exploratory and/or drilling of any kind. We are determined to remain free from such exploitation. Drilling

I-247



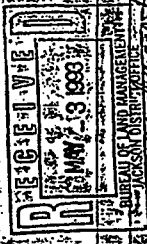
Bureau of Land Management

I support the findings in the draft
environmental impact statement on
Shell's drilling plans on the
Micanokie Indian Reservation in
Florida.

Mrs. Aubrey

9606 Al Aubrey
18940 U.S. 15 N.E. 319
Clearwater
Florida 34624

I-248



Dear Mr. Aubrey

Recently on May 10, 1983, I was outraged when I heard that you spoke to many people regarding this issue and not including anyone I spoke to asked what if this happened it would be nothing. Next of a crime. The Seminole County is the only water well that is not protected. That they (Shell) produced drilling a year ago and never produced. This with the fact that I would not produce an environmental impact statement. Now, one year later, Shell has produced one but

I-249

it is an intercompany report and not a government hired agent that produced this statement. To say that there would be no or little impact on the environment should they drill is ludicrous. Oil companies have time and time again proved to be very careless dumping hundreds of thousands of gallons of oil in our water supplies everywhere. If this happens just one time the repercussions would be devastating, not only to the many endangered species in the gulf suffering from environmental damage already done to date but also to the entire South Florida population. I for one am not willing to take

I-250

that risk. I also don't think that what Shell will gain is worth what we all have to lose by doing to our environment that is inevitable just because they deny that anything negative would happen doesn't make it so. Please I urge you for the Everglades' sake, for the endangered animals' sake, for South Florida's sake, for the environment's sake, for our futures sake don't let this happen ever!

Concerned

Cathy Merrill

I-251

I-252

APRIL 16, 1993

To: Bureau of Land Management

MY HUSBAND AND I HAVE LIVED IN FLORIDA SINCE THE 1970'S AND HAVE SEEN FIRSTHAND WHAT OVERDEVELOPMENT AND OVERPOPULATION HAVE DONE TO FLORIDA'S FRAGILE ECOSYSTEM. EVEN THE IDEA OF ALLOWING SHELL OIL TO DRILL IN THE EVERGLADES IS OBSCENE, BUT THOSE WHO ARE IN FAVOR OF PERMITTING THIS TO ACTUALLY HAPPEN ARE EVEN MORE OBSCENE. OUR WATER SITUATION IN FLORIDA IS CRITICAL AND THE IDEA THAT A DRILL SHAFT WOULD PASS THROUGH THREE POTENTIAL DRINKING WATER SOURCES IS OUTRAGEOUS.

WE ARE STRONGLY OPPOSED TO ANY OIL WELL EXPLORATION IN FLORIDA AND ESPECIALLY OPPOSED TO DOING SO IN THE EVERGLADES. HUMAN INTERVENTION HAS ALREADY DONE SIGNIFICANT DAMAGE TO THIS UNIQUE NATIONAL PARK. PLEASE DO NOT ALLOW THE RAPE OF OUR EVERGLADES BY AN OIL WELL DRILLING SHAFT TO OCCUR.

SINCERELY,

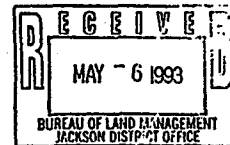
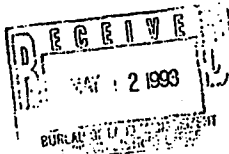
Barbara L. Meyers

BARBARA L. MEYERS

Jules V. Meyers

JULES V. MEYERS

CC: GOVERNOR LAWTON CHILES
SENATOR BOB GRAHAM
SENATOR CONNIE MACK



May 3, 1993

B.L.M.
411 Briarwood
Suite 404
Jackson, Ms 39206

CHARLES & NANCY MILLER
3117 TWIN LAKES LANE
SANIBEL, FLORIDA 33957

Subject: Oil Drilling, Miccosukee Indian Reservation, Broward County, Florida.

Dear Sirs,

This letter is to show my support for the drilling of a oil well on the above subject location.

My reason for supporting the drilling is as follows.

A. Our dependence on foreign crude oil places our nation in a precarious position.

B. Long term disturbance of wildlife, wetlands, air and water would be absolutely minimal.

C. Drilling techniques are safe and well tested. Spills are never heard of.

D. Company drilling the "Well" is environmentally responsible and would do an excellent job to protect the area.

I-253

I-254

9040 NW 60 St
Tamarac, FL 33321
April 24, 1993

Dear Swornsmen,
I am not in favor of allowing the Shell Oil Company to dig an exploratory oil well in the Everglades. Gallons of oil and salty brine have already been spilled in the Big Cypress Swamp, allowing the oil to soak to a depth of over 4 feet. If oil should be discovered, the environmental impact would be devastating.

The problems of the Everglades has been well documented and with the legislation introduced by U.S. Rep. E. Clay Shaw, perhaps we may see a recovery at least in part, for the future of the Everglades. The only individuals in favor of this drilling will be those receiving a monetary compensation.

Please seriously consider the environmental impact upon decision will affect on the future of our Everglades.

Sincerely,
Margie Miller



Jackson District Office
Bureau of Land Management
411 Briarwood Drive
Suite 404
Jackson, Miss. 39206



To whom it may concern:

It has come to my attention that Shell would like to start oil drilling in the Everglades, and that this issue must be voted on. I urge you to vote against the oil drilling. Not just for the preservation of the Everglades, but for the water that it supplies South Florida.

I live in Unincorporated Fort Lauderdale. This is only 10 miles west from the future drilling site. I also do not have city water, I have well water. This water comes from a water supply under the ground. My fear with the drilling is that it will contaminate my water supply.

As a concerned citizen, I ask of you, please when it comes time to vote; vote against the drilling. If not just for the beauty of the Everglades, for the people that benefits from her water supply.

Respectfully yours,

The Mills Family

45

I-255

Dear Mr. Abbey

We would like the permit application denied to drill for oil in the Everglades.

Sincerely
Evelyn B. Franz

I-256

DRAFT ENVIRONMENTAL IMPACT STATEMENT
APPLICATION FOR PERMIT TO DRILL
AN EXPLORATORY WELL
ON THE
MICCOSUKEE INDIAN RESERVATION

MAY 17 1993
BUREAU OF LAND MANAGEMENT
JACKSON DISTRICT OFFICE

Written comments on the Draft Environmental Statement are being accepted until May 18, 1993. Comments on the analysis and the preferred alternatives are specifically sought. Please provide your name and address. Comments should be sent to:

District Manager
Bureau of Land Management
411 Briarwood Drive, Suite 404
Jackson, Mississippi 39206

Attention: Robert V. Abbey

COMMENTS:

Jacqueline Monckton
1030 N.E. 204th Terrace
N. Miami Beach, FL 33179

Dear Mr. Abbey:

I presently attend Broward Community College in Hollywood Florida, and was part of the audience which attended the public hearing on April 14, 1993. At the hearing, there were many arguments, while there were a few in support for drilling in the Everglades, I was astounded by the number of people who were opposed to this venture.

Within recent years, oil companies

I-257

and their techniques for drilling and transporting oil have become under great scrutiny and criticism. Not only nationally, but internationally, as well. While there are many individuals who "adopt" a cause simply for the limelight, it is to my strong belief that the safety of the environment is their prime concern in this instance, and if there are any alternatives, they should be examined and used if possible.

I feel no animosity towards Shell for they like any business primarily out to maximize profits, and account to their shareholders. The bad publicity, potential lawsuits and loss in business which may accompany drilling in the everglades may "evolve" any potential profit which may result.

In closing, I urge you to reconsider since the world is not in an oil crisis, and since most individuals would not blame Shell Oil Company for exploring for oil in the Everglades.

Please exhaust all your options before allowing man and machinery into this beautiful fragile environment.

Respectfully yours,

Jacqueline Monckton

I-258

5/14/93

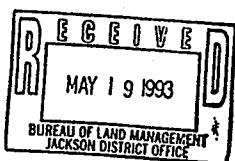
I oppose Shell's drilling in the Everglades. Please do what ever necessary to stop this killing of our land.

Sincerely,

John Morgan

RECEIVED
MAY 19 1993
BUREAU OF LAND MANAGEMENT
JACKSON DISTRICT OFFICE

I-259



May 15, 1993

To Whom It May Concern;

What is this world coming to? Have we gotten to the point where we will allow Shell Oil Company's greed for more oil destroy our one and only Everglades? If there is an oil spill from all of this drilling not only is there going to be a terrible disaster to the water, but there are going to be many fish and birds that will die and maybe even become extinct or completely wiped out. As a college student, I hope to one day take my children to the wonderful Everglades to see the wildlife and enjoy the natural untamed beauty.

Thank you,

Dana Morgan

Dana Morgan
1719 Coral Ridge Dr.
Coral Springs, FL 33071

PLEASE, stop the
drilling

I-260



Robert Abbey
Bureau of Land Management
411 Briarwood Dr. #404
Miss. 39206

5/13/93

Dear Mr. Abbey

I am writing to express my deep concern and abhorrence to possible drilling in search of oil in our Everglades.

I strongly recommend reviewing Shell Oil's motive, promises and the consequence of an exploratory well being so near the Biscayne Aquifer. (Please review the problems and deficiency of Big Cypress Swamp.)

The ancient marshland is a key link in our water supply, moderates our climate and attracts one million-plus tourists to our area. It has been decreed a place of safety for wildlife and a zone of our planet where life naturally occurs - set apart from development. Such an area is vital and not an appropriate place for industrial activity.

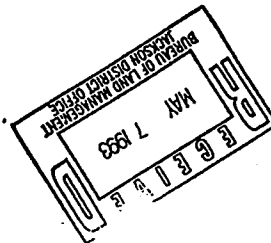
Rest assured I will do all I can to stop any drilling and will encourage all Floridians and Americans to speak out - write out and vote out against this!

Sincerely,

Pam Morgan
809 SW Coconut Dr.
Ft. Lauderdale, FL.
33315

I-261

Apr. 28, '93
"There are no other
Everglades in the world"
They are in ^{FL} ~~recess~~
decisions, as you well
know. Over very late
in So FL defendants
saying "Yes."
I challenge the
request of Shell Oil
to permit drilling by
oil in the Everglades.
Please see to it that
it doesn't happen!
Sincerely,
Marilyn F. Murray
LW
Murray



I-262

May 4 1993
Bureau of Land Management
Briarwood Suite 404
Jackson, Miss. 39206
at Mr. Rodgers -
I am in full support
of the findings of
The Draft Environmental
Impact Statement
I have been an full
resident of Florida
for over twenty-two
years before that
seasonal since 1979 -
Sincerely
Margaret Murray

I-263

"The Everglades is a test. If we pass it, we may inherit the Earth."

-Marjorie Stoneman Douglas & the Friends of the Everglades

15 April, 1993

To Whom It May Concern:

With reference to Shell Oil's proposal to initiate oil surveys in south Florida, I would like to express my steadfast opposition.

The Miccosukees (upon whose land Shell wishes to drill) are satisfied with the oil company's environmental protection plans. However, they are not necessarily experts in environmental protection or wildlife management.

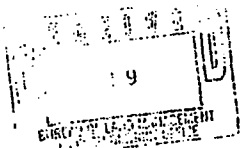
Industrialization surrounding Everglades National Park has already affected it severely. Population growth has decreased winter water levels 80% by some estimates. Mercury recently discovered in fish in the northern Everglades has already found its way into bald eagles in Florida Bay. Industry within the park can do no less damage.

Finally, if BLM gives the green light for Shell to step over the park boundary, other oil companies, phosphate miners, and perhaps even agribusinesses will be waiting in the wings.

Do not be the agency to sign the death warrant of Florida's greatest natural resource.

Sincerely,

Fred Myers
Fred Myers
Citizen, Miami, Florida



I-264

Re: Drilling in Everglades April 31, 1993.
This is to inform you that I am opposed to any exploratory drilling in the Everglades. I know you share my concern for this fragile ecosystem. It is quickly being depleted by population growth, increased water demands, and the sugar cane industry. Please respond.

Cory Nagel
4746 Pinecrest Dr. #21
Miami Beach, Fla 33140

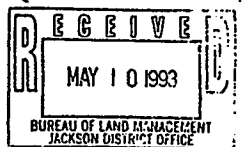
I-265

Paul Nanes
1700 N.W. 80th Ave Apt #04
Margate, Fla 33068
May 4, 1993

Gentlemen;
I am in favor of allowing "Shell" to drill the proposed exploratory well on the Miccosukee Indian Reservation in Broward County

Sincerely,

Paul Nanes



PAUL NANES

I-266

Bureau of Land Management

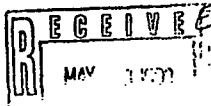
4/29

Don't let the oil companies get their foot in the door!! We as a people should not encourage more oil exploration. Instead we should be encouraging the exploration of alternative clean energy resources.

The everglades is all south Florida has left. And like as we know it

here will change forever if the oil companies are allowed to destroy it.

Don't promote the end of the Everglades.

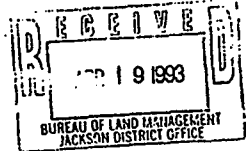


Linda Neale
3903 NW 72 Lane
Coral Springs, Florida
33065

305-344-7830

I-267

665 SW 4th Av - Apt B
Ft. Lauderdale, FL 33315
April 16, 1993



Jackson District Office
Bureau of Land Management
411 Briarwood Drive
Suite 404
Jackson, Miss. 39206

Dear Madam or Sir:

I say NO to drilling in the Florida Everglades.

The oil industry is "pimping" our natural resources to the customer who has no other choice but to "buy."

We're in a quandary folks. When I say "we" I mean ALL of us. The group includes the oil executive who drives his Cadillac to the country club. The group includes the lobbyists in Washington who are hired by the executives. Myself. I drove to the store to purchase this paper to type my letter on. You get the picture.

Let's spend our money on research and development. Let's put some of those college degrees to good use, rather than finding new ways to screw the customer.

It's the 90's folks. The Industrial Revolution first belloyed its smokey plocms more than a hundred years ago.

I hope you understand.

Thanks for your time.

Sincerely,

Steve Nelson
Steve Nelson

I-268

Let Shell drill in Hell

By

ADRIAN AUMEN

Talk about outrageous.

With all the predictions about how much it's going to cost us to clean up the Everglades and the water wars that could divide South Florida, Shell Oil Company still wants to drill in the middle of the Everglades.

The very idea of poking more holes in the already ailing system and increasing risks to wildlife and water supplies is nothing short of arrogant.

So is Shell's attempt to "greenwash" the plan by presenting an Environmental Impact Statement that uses outdated maps and information. It only skims the surface of issues such as the effects on groundwater and future restoration plans.

The proposed drill site is at the edge of the Big Cypress National Preserve (located by the Collier/Broward line, north of Alligator Alley) and the world-renowned sawgrass marsh, a conservation area that keeps Broward and Dade counties from running out of water. State rules prohibit direct drilling in the conservation area, so Shell came up with a way around it - by drilling at an angle. The drilling rig would be outside the conservation area, on land owned by the Miccosukee Indians (read: federal land). The end of the drill would be 4,700 feet east - smack dab in the conservation area, at 18,850 feet down.

Slick. The drilling rig would stand in a cattle pasture within 200 feet of a canal and only 1,000 feet from a pumping station that funnels water into the Everglades water catchment areas. Imagine what a hurricane could do with that setup. The area is also home to Florida

panthers, wood storks, Everglades kites, Everglades minks and, in the Shell study's own incriminating words, "other waterfowl" (sic).

Shell's tenacity would make you think it expects to find a pool of oil the size of Prince William Sound, but even the experts doubt there's much to be found. There's not much oil in Florida, and the oil that's here is of such poor quality that it's hardly worth refining. Could it be worth losing the Everglades?

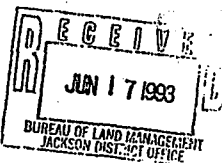
Shell admits that, if it finds oil, it's likely to seek more drilling. It also admits that spills are inevitable.

Exxon and other firms drilling nearby have been unable to prevent spills. Almost 163,000 gallons of crude oil and 120,000 gallons of plant-killing brine already have been spilled in the Everglades area. Unchecked, one gallon of petroleum can contaminate one million gallons of drinking water.

That's why about 300 South Floridians, and even some tourists, crammed a recent public hearing in Broward County to talk with Washington bureaucrats on the issue.

"Tell Shell to drill in Hell!" yelled some folks.

Others are cutting up their Shell credit cards and taking their business elsewhere. Not a bad idea.



I-269



7613 Borynton Bay Circle
Borynton Bch., FL 33437
April 20, 1993

Dear Mr. Abbey,

I believe it would be a great mistake to allow Shell Oil to drill in the Everglades. I oppose this on several grounds. First, it is a threat to our drinking water. No matter what precautions would be taken, the potential for contamination is too high. Secondly, it puts the fragile ecosystem of South Florida, specifically, our dependance on the Everglades remaining the "Everglades", in jeopardy. I am adamantly opposed to anything that further changes our environment in the name of progress.

I-270

I-271

In most cases progress is a synonym for profit. I site the messes made when the Kissimmee River was straightened and the Melaleuca was imported. Thirdly, I resent being bombarded with media advertisements to conserve water, plant and landscape wisely, and appreciate the intrinsic as well as actual value of water, land, and animal life while people and businesses which wield much more power show much less accountability.

We can not walk both sides of the street. Please make a commitment to a better future by rejecting Shell's request to sink anykind of well on any or near any environmentally sensitive land.

Sincerely,
Fletcher M. Nicula

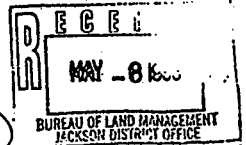
April 28

Dear Sirs

I'm one of your good
Shell oil customers.

Please do not drill in
Everglades.

Helen K. Nicula
(Mrs. Daniel H.)
1762 SE 7th
Ft. Lauderdale FL 33316
(778 913-0388 4001)



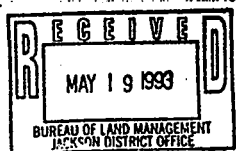
I-272

I-273

5/15/93

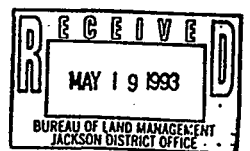
I uppose oil drilling
in the Everglades.

Matthew Noonan

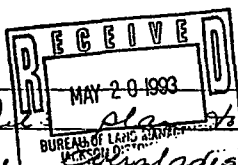


Please do not allow the greed
of Shell Oil and these
indians to ruin our Everglades.
It's the only Everglades in
the whole world and no
amount of money is worth
its destruction.

Susan Noonan



I-274

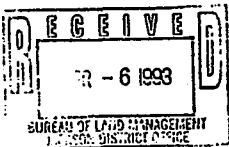


Concerning Shell Oil plans to
drill for oil in the Everglades:
If there is one chance in
one million that something
will go wrong and pollution
will occur, it's one chance
for many.

Please do not allow this drilling
to take place.

Susan Noonan
1719 Coral Ridge Dr.
Coral Springs
FL 33071

I-275



Dear District Manager:

I am a concerned South Florida resident asking you to please
stop Shell Oil Co. from exploratory drilling in the eastern Ever-
glades.

May I remind you that this is a CONSERVATION area, where our
fragile environment is supposed to be PROTECTED, not threatened
by a company whose only purpose is to make a profit at the expense
of our main source of fresh water.

I am vehemently opposed to this drilling, and will do every-
thing in my power to see that it is stopped.

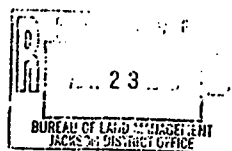
Thank you for your time.

Richard A. Obregon
RICHARD A. OBREGON

I-276

April 15, 1993

Jackson District Office
Bureau of Land Management
411 Briarwood Drive
Suite 404
Jackson, Miss 39206



Dear Mr. Robert Abbey:

This letter is to make a strong protest against Shell Oil drilling
in our precious everglades.

The everglades eco-system is fragile as it is, without Shell Oil
and its major equipment wrecking the place and spilling oil into
our drinking water.

Also, I'm reading about this for the first time in Thursday's April
15 edition of the Ft. Lauderdale Sun-Sentinel. How did Shell Oil
manage to get so far along with their plan without more public
meetings? And how could you even consider for one minute to go along
with such a scheme?

We need to have our everglades protected from any further damage,
not exploited for Shell Oil's profit!

Please, I urge you Mr. Abbey, don't let any drilling go on in the
beautiful Florida Everglades!

Sincerely,

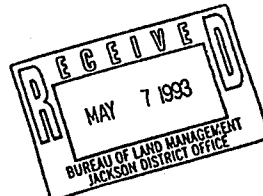
Patricia C. Cunniff

I-277

Dear Mr. Abbey,
Please deny the permit requested by Shell Oil to drill a well in the Florida Everglades. This area is in the "historic" Everglades region. As a Floridian, I request that you not allow the drilling.
Thank you.
Jim Craig-Oliver

I-278

To:
The Bureau Of Land Management
411 Briarwood, Suite 404
Jackson, Ms. 39206



To Whom it May Concern:

This letter is in reponse to the proposed Drilling on the Muscosukee Indian Reservation in western Broward county, Florida. I am an employee of Shell Offshore Inc. And am a resident of Florida. I believe that this venture would be an asset to the citizens of the Reservation and the people of Florida. This company has proven that they are dedicated to the preservation of the environment and the welfare of the people. Let this be a joint venture for the benefit of the people of Florida.

Yours Truly:

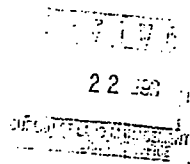
James R. O'Neal

James R. O'Neal

I-279

I-280

Jackson District Office
Bureau of Land Management
411 Briarwood Drive
Suite 404
Jackson, Mississippi 39206



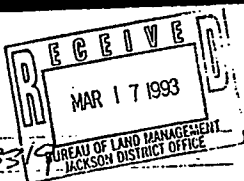
To whom it may concern:

As a south Floridian who values the environmentally sensitive Everglades, I am adamantly opposed to Shell Oil's plans to drill for petroleum there. No number of precautions can assure that contamination will not eventually occur, due either to a natural or human-induced disaster. I urge you to make all efforts to thwart Shell's plans to exploit the Everglades. . . before it is too late for our wildlife, our economy, our water supply, and the preservation of the unique and natural beauty of the Everglades.

Very Concerned,

Angley
James R. O'Neal
11521 NW 5th St
Plantation, FL
33325

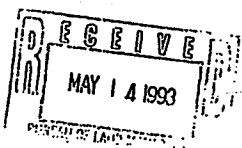
4507 NW 47th St
Tamarac, FL 33319
March 11, 1993
Dear Mr. Abbey,
I am writing you to protest the possibility of Shell Oil drilling in our Everglades. Besides the danger involved in the pollution of South Florida's water supplies, we object to the trampling of the environment and danger to wildlife. Tourists come from all over the world to visit what they consider to be a wonder of the world: the wilderness. They certainly do not want to see an oil derrick. Keep Shell Oil out of our Everglades.
Very truly yours,
Beverly O'Neal



I-281

MAY 12, 1993

BUREAU OF LAND MANAGEMENT
411 BRIARWOOD, SUITE 404
JACKSON, MS 39206



DEAR BUREAU OF LAND MANAGEMENT,

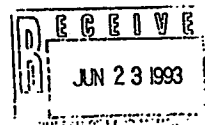
I SUPPORT THE FINDINGS IN THE DRAFT ENVIRONMENTAL IMPACT STATEMENT ON SHELL'S DRILLING PLANS ON THE WICCOSUKEE INDIAN RESERVATION.

I BELIEVE THAT WE MUST CONTINUE TO PRUDENTLY DEVELOP THE NATURAL RESOURCES AVAILABLE TO US.

Tom Paddock

TOM PADDOCK

I-282



Robert V. Abbey, District Manager
Bureau of Land Management
411 Briarwood Drive, Suite 404
Jackson, MS 39206

6/30/93

Dear Mr. Abbey:

I understand that from now until November you will be deciding whether or not to issue Shell Oil a permit to drill an exploratory well in the Florida Everglades. Even though the area is not within Everglades National Park, it is still in the "historic" Everglades. Please deny the permit.

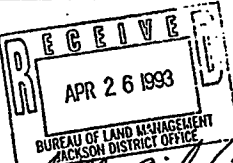
Very sincerely,

Kathy Pawlak

Kathy Pawlak
7162 Regiment
Cincinnati, Ohio 45244

I-283

A MEMO FROM
BROWNE



Dear Sirs,
I do not believe Shell Oil Co.
should drill for oil in our
precious Everglades.

Browne Brown

nil 20, 1993

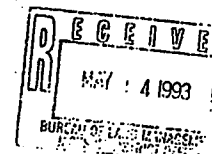
LET'S RECYCLE PAPER!

I-284

Dear Mr. Robert Abby, May 5, 1993

I'm writing in regards to the proposed test drilling in the Everglades by Shell Oil Company. As an Environmentalist, I see the detrimental effects of this drilling. Please use all of your resources to prevent this catastrophe. Even if I wasn't an environmentalist, common sense tells me the Everglades are very fragile. They certainly don't need further tampering with.

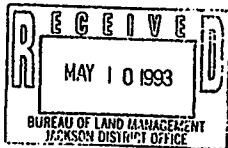
Thanking you in advance,
Walter D. Peary



I-285

I-286

9741 Fairway Circle
Leesburg, FL 34788
May 5, 1993



Bureau of Land Management
411 Briarwood
Suite 404
Jackson, MS 39206

Gentlemen:

Some time ago I wrote to your office in support of Shell Oil Company's proposal to drill a well in South Florida on the Miccosukee Indian Reservation in western Broward County. I still support Shell's effort in this endeavor for a variety of positive reasons.

I am writing today in support of the draft environmental impact statement (DEIS) which has been prepared for the BLM by Dames and Moore Consulting Company of Boca Raton, Florida.

It is my understanding that the DEIS states that drilling of the proposed exploratory well would cause some short-term disturbance to components of the human and natural environments, but would not have significant impacts on water, air, vegetation, wetlands or wildlife. Knowing Shell as I do as an excellent corporate citizen I have every confidence they will implement, with a high degree of satisfaction, all measures recommended in the draft to mitigate all short-term disturbances.

As an American and as a native Floridian it is important to me that we as a nation do all possible to assure both present and future generations of Americans a continuous adequate supply of domestic crude. Therefore, I urge you to give positive consideration to the DEIS statement.

Sincerely,

Burnette Pope
Burnette Pope

PLEASE !!!

Do not allow Shell to drill for oil in or near the Everglades. Half of it has already been destroyed. Florida Bay is dying. The Northwest is being clean-cut to death. Preserve the Everglades

Elcid Port

23320 Berkeley Dr. Boca Raton, FL 33433

I-287

I-288

749 Palm View Dr.
Naples, FL 33942
May 11, 1993

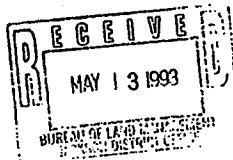
Mr. Robert V. Abbey, District Manager
Bureau of Land Management
411 Briarwood Dr., Suite 404
Jackson, MS 39206

Dear Mr. Abbey:

I strongly oppose permitting Shell Oil Co. to drill for oil in the Everglades.

Sincerely,

Louise C. Porter
Louise C. Porter



749 Palm View Dr.
Naples, FL 33942
May 11, 1993
May 11, 1993

The Hon. Bruce Babbitt
Secretary of the Interior
1849 C Street N.W.
Washington, D.C. 20240

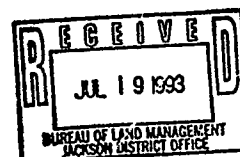
Dear Mr. Babbitt:

I strongly oppose permitting Shell Oil or any other oil company to drill in the Everglades. This area is very environmentally sensitive. It must be preserved for posterity.

Sincerely,

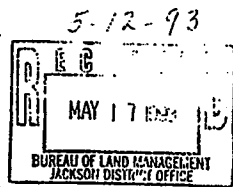
Louise C. Porter

Louise C. Porter



I-289

SLM
411 Briarwood, Suite 404
Jackson, MS 39206



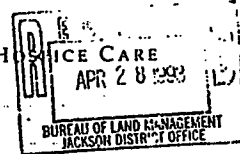
Dear Mr. Abbey, District Manager:
I've been a resident of Florida for 34 yrs.
and do not want Shell Oil drilling in any part
of our Everglades.
Thank you.

Sincerely,
H.M. John P. Novichy

I-290

VITAS

INNOVATIVE H



4-25-93

I am writing to comment
on the Shell Oil Drilling
Proposal in the Florida
Everglades. As a Florida
Native & a concerned
"environmentally conscious"
American citizen, I am
totally opposed to Shell or
any other company drilling
in any area protected
for its wildlife and
sensitivity to outside
interference.

It has been proven in other
areas, that such interference
as drilling, digging, and
experimental dragging can be
as devastating to the precious
& sensitive environment as
a hurricane or other act of nature.
Although, I am just a citizen

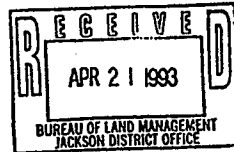
I-291

alone, not an activist,
I am still very concerned for
the preservation of the Everglades.
It is one of our last Florida
areas not touched by construction,
building of highways,
tests, experiments, humane
are everywhere.

My contention is to
Leave the Everglades as
they are - no drilling, no
experiments. Let Nature
have a place of its own.
Keep the Species intact.
Shell may have all of the
newest equipment for
drilling - but it is a start
in the wrong direction.

Sharon Prana
430 N. Commodore Dr.
#302
Plantation, FL
33325

I-292



April 19, 1993
3921 Crystal Lake Drive
Apartment 109
Pompano Beach, Florida
33064

To Whom It May Concern:

Gentlemen, I can't believe that there
is any possibility, rational, logical, reasonable,
ecologically, human, necessity or any other
reason for you to even consider drilling an oil
well in the very "heart" of South Florida.

As any layman will tell you, the
Everglades is the heart and the blood lines of
South Florida.

Everyone knows there is a possibility
of a water shortage even on every day basis
in South Florida. And you want to "experiment"
to see what is down there, as we all know. The
question is, how much oil is there?

The whole world knows your "safeguard"
are only an excuse to get an approval. They don't
work, it's an everyday threat to our ecology,
and it just isn't worth the risk.

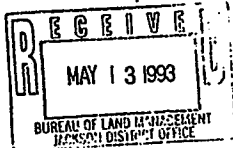
Again it looks like "BIG MONEY" is
doing the talking and everyone is a puppet in
these lands.

Be firm, logical, considerate, reasonable
and an American, "VOTE NO." ~~EARL J. PERCELL~~

I-293

Charles J. Raymond
3901 S.E. Fairway West
Stuart, Fla. 34997

Bureau of Land Management
411 Briarwood Suite 404
Jackson MS. 39206

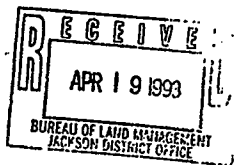


Dear Mr. Abbey: I have been aware that Shell is proposing to drill a well in the Micoosukee Indian Reservation in Western Broward County. Meanwhile a draft environment impact statement (DEIS) has been prepared by James and Moore Consulting Co. in Boca Raton, Fl. It is my understanding this statement is now open for public comment and as an interested party, I am writing in support of the conclusions reached in the (DEIS)

Yours very truly,
Charles J. Raymond

I-294

Deborah A Reader
4615 Carambola Circle South
Coconut Creek, Florida 34223



15 April 1993

Mr. Robert Abbey
Jackson District Office
Bureau of Land Management
411 Briarwood Drive, Suite 404
Jackson, Mississippi 39206

Dear Mr Abbey:

I find it difficult to believe that this letter will influence your decision regarding the Shell Oil drilling in the Everglades but feel compelled to write regardless.

It is a wonder to me that in this age of environmental awareness there are those who feel that drilling for oil in such an environmentally sensitive area would pose no danger to the area. The state of Florida already has a multitude of environmental problems which it can hardly handle, adding oil drilling is not an acceptable additional risk.

Please choose to protect what few natural assets Florida still has for this generation and for my child's.

Regards,

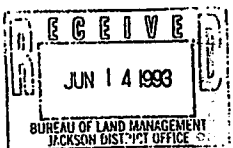
Deborah A. Reader
Deborah A. Reader

cc: President Clinton
Senator Bob Graham
Senator Connie Mack
Governor Lawton Chiles

I-295

Robert V. Abbey, District Manager
Bureau of Land Management
411 Briarwood Dr., Suite 404
Jackson, MS 39206

365 Hamilton Ave.
Safety Harbor, FL
34685



Dear Mr. Abbey:

We have learned that Shell Oil wants a permit to drill an exploratory well in the Florida Everglades.

We, as well as many others, are deeply concerned about this proposal and sincerely hope that you will deny the permit.

Please give this important matter your most careful consideration. Thank you.

Sincerely,

Winifred and Otto Renter

June 10, 1993

I-296

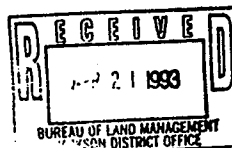
Jackson District Office
Bureau of Land Management
411 Briarwood Drive
Suite 404
Jackson, Mississippi 39206

To whom it may concern:

As a south Floridian who values the environmentally sensitive Everglades, I am adamantly opposed to Shell Oil's plans to drill for petroleum there. No number of precautions can assure that contamination will not eventually occur, due either to a natural or human-induced disaster. I urge you to make all efforts to thwart Shell's plans to exploit the Everglades. . . before it is too late for our wildlife, our economy, our water supply, and the preservation of the unique and natural beauty of the Everglades.

Very Concerned,

M. Tamara Rimes
M. Tamara Rimes, Esquire
1617 N.E. 4 Place
Ft. Lauderdale, FL 33301



I-297

Ms. Derry L. Riquelme
7233 Dartmouth Av. N.
St. Petersburg, FL 33710

Dear Mr. Abbey -

This is a letter of protest against the idea of drilling for oil in the Everglades. Do you understand the importance of the decision you will be making? Do you know how Florida feels about the Everglades? Beyond that, have you considered what we all risk to lose?

I'm not going to go into great explanation of how the food chain could be affected, how our water supply could be damaged, all the wildlife and the nature that could be devastated. Unless you've had your head in the sand you already realize all this. I'm sure as citizens of this earth you are all aware of the delicate balance between the environment and man, and how out of kilter the balance has become. I'm sure you realize that we must be past the point of doing more damage to our planet, we should be repairing the damage we have already done. Are you so pessimistic that you believe the environment is at an irreparable state? Do you believe we might as well use the resources up before someone else does, since we are doomed anyway. With this attitude why not go out and steal or murder

Isn't that what you will be doing anyway? Maybe not so

I-298

state? Do you...
up before someone else does, since we are doomed anyway. With this attitude why not go out and steal or murder. Isn't that what you will be doing anyway? Maybe not suddenly, but inevitably you will. How could you honestly sleep at night knowing you will go down in memory as the person who allowed for the devastation of our Everglades, Florida's most precious, untouched part of nature?

Sincerely,

Derry L. Riquelme

I-299

JOCK RITCHIE

4100 NORTH OCEAN DRIVE (APT. 1703)
SINGER ISLAND FL 33404-2856
(407) 881-8831

May 21, 1993

Dear BLM:

By chance, these two items appeared together in yesterday's Wall St. Journal:

The U.S. trade deficit deteriorated to \$10.21 billion in March, the widest gap in nearly four years. The figure stems from an import surge, which analysts say can't be sustained. February's deficit was \$7.91 billion.
(Article on Page A3)

U.S. oil production is falling faster than expected, and petroleum imports are rising as a result, a report says. Most of the import rise stems from deteriorating domestic supplies rather than strong growth in consumption.
(Article on Page A3)

They make a point, that unless we are prepared to take the risks (minimal, in fact, compared to tanker movements!) of oil drilling

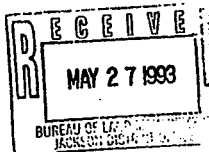
here in America our dependence on imported oil

will increase, to the detriment of our trade balance, and the total price of a barrel of crude oil will be paid out from the U.S. Domestic crude, on the other hand, is a source of American jobs, and the price stays home.

I therefore strongly support the conclusions of the DEIS regarding the proposed Shell oil exploration well in western Broward County -

yours truly

Jock Ritchie



I-300

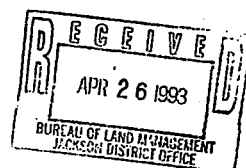
Jackson District Office
Bureau of Land Management
411 Briarwood Drive
Suite 404
Jackson, Mississippi 39206

To whom it may concern:

As a south Floridian who values the environmentally sensitive Everglades, I am adamantly opposed to Shell Oil's plans to drill for petroleum there. No number of precautions can assure that contamination will not eventually occur, due either to a natural or human-induced disaster. I urge you to make all efforts to thwart Shell's plans to exploit the Everglades... before it is too late for our wildlife, our economy, our water supply, and the preservation of the unique and natural beauty of the Everglades.

Very concerned,

Lina M. Rizzo
1330 SE 4th Ave
Pompano Beach, FL
33060



I-301

April 28, 1993

Dear Mr. Abbey,

I think the permit that Shell Oil Co. has applied for to drill for oil in the Everglades should be denied. The Everglades is a unique ecosystem that is currently in distress due to man's attempt to "improve" the land. If permitted to drill for oil in this area, there is a risk of further damaging this system.

Sincerely,
Grace Roberts



I-302

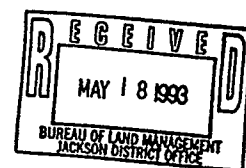
P.O. Box 739
Marlboro, MA 01751
May 15, 1993

Robert V. Abbey, District Manager
Bureau of Land Management
411 Briarwood Drive, Suite 404
Jackson, MS 39206

Dear Mr. Abbey,

I urge you to deny a permit to drill oil or any wells in or near the "historic" everglades in Florida.

Sincerely,
Dr. E.B. Robinson Jr.



I-303

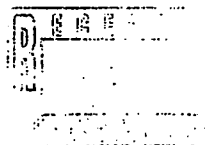
Jackson District Office
Bureau of Land Management
411 Briarwood Drive
Suite 404
Jackson, Mississippi 39206

To whom it may concern:

As a south Floridian who values the environmentally sensitive Everglades, I am adamantly opposed to Shell Oil's plans to drill for petroleum there. No number of precautions can assure that contamination will not eventually occur, due either to a natural or human-induced disaster. I urge you to make all efforts to thwart Shell's plans to exploit the Everglades... before it is too late for our wildlife, our economy, our water supply, and the preservation of the unique and natural beauty of the Everglades.

Very Concerned,

Paul W. Rodriguez



I-304



Dear District Manager:

I am a concerned South Florida resident asking you to please stop Shell Oil Co. from exploratory drilling in the eastern Everglades.

May I remind you that this is a CONSERVATION area, where our fragile environment is supposed to be PROTECTED, not threatened by a company whose only purpose is to make a profit at the expense of our main source of fresh water.

I am vehemently opposed to this drilling, and will do everything in my power to see that it is stopped.

Thank you for your time.

Paul W. Rodriguez
2585 W 26 Ave Spd 108
33016

I-305

4/29/93

Dear Mr. Abbey,
I am against having Shell
Oil drill in the Everglades.
The environmental impact statement
funded by Shell Oil relies on
outdated maps & erroneous
conclusions. This is a unique
eco system, which is in distress.
Further risk is unwarranted.

85

Sincerely,
Bernice Rubin

B. Rubin
16832 Patrio Village Ln.
Ft. Lauderdale, FL 33326



I-306

Mr. & Mrs. Dennis Russell
10212 SW 53 CT
Copper City FL 33328
May 12, 1993

Jackson District Office
Bureau of Land Management
411 Briarwood Dr.
Suite 404
Jackson, MS 39206

Dear Sir:

We are writing the Bureau to
advise them we strongly
oppose the project being
proposed by a Shell Oil
subsidiary to drill for oil
on land owned by the Miccosukee
tribe located in the Everglades
in our state of Florida. Many local
agencies are also opposed to these
plans including the South Florida
Regional Planning Council.

The Everglades are the most
endangered national park in the
country. The government ignored for
many years the sugar cane farmers

I-307

that polluted the Everglades.
The government needs to protect,
not exploit, the sensitive
vegetation and wildlife of the area.
The Everglades more importantly
provides South Florida its drinking
water. Has the "environmental
impact statement" stated
how it will provide all of
us fresh drinking water in
the event of a major disaster?

40

It appalls us that this
proposal is even being considered.
We oppose the exploitation
of the Everglades & request that
you oppose this project.

Thank you for your cooperation.
We would like a written reply
with the final outcome of this project.

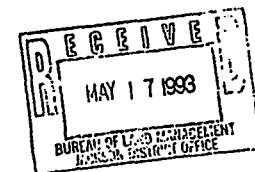
Sincerely,
Dennis Russell
Dennis Russell

I-308

James J. Ryan
259 Capri Avenue
Lauderdale-By-The-Sea, FL 33308

13 May 1993

Jackson District Office
Bureau of Land Management
411 Briarwood Drive
Suite 404
Jackson, MS 39206



Dear Sirs,

I am sternly against exploration and drilling for oil in the Florida Everglades,
whether by Shell Oil Company or any other member of the industry.

We are just now beginning to realize the importance of the role that the everglades
plays in the lives of Floridians, if not all Americans. The everglades are already fragile and
endangered. The stress and risk that will undoubtedly be imposed by oil exploration is very
high and unnecessary. Shell Oil's resources would be more wisely spent on research and
development of alternative means of energy and conservation. There is plenty of sun and
wind here in south Florida that could be harnessed without anywhere near the risk imposed
by "safe" practices of the oil industry.

Thank you for your time and consideration.

Sincerely,

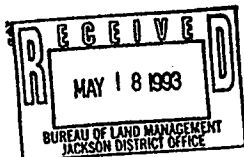
James J. Ryan
James J. Ryan

I-309

Karen L. Ryan
259 Capri Avenue
Lauderdale-By-The-Sea, FL 33308

13 May 1993

Jackson District Office
Bureau of Land Management
411 Briarwood Drive
Suite 404
Jackson, MS 39206



Dear Sirs,

I am sternly against exploration and drilling for oil in the Florida Everglades, whether by Shell Oil Company or any other member of the industry.

We are just now beginning to realize the importance of the role that the everglades plays in the lives of Floridians, if not all Americans. The everglades are already fragile and endangered. The stress and risk that will undoubtedly be imposed by oil exploration is very high and unnecessary. Shell Oil's resources would be more wisely spent on research and development of alternative means of energy and conservation. There is plenty of sun and wind here in south Florida that could be harnessed without anywhere near the risk imposed by "safe" practices of the oil industry.

Thank you for your time and consideration.

Sincerely,

Karen L. Ryan
Karen L. Ryan

I-310

~~GMAC Mortgage Corporation~~

Dear Bureau of Land Mgmt.

Haven't the oil companies in general proven that they can't be trusted to protect our environment? If they are allowed to drill in our precious everglades, not only are we risking our natural habitat above ground but also our drinking water! Come on.... the line must be drawn here. Don't let them drill. Keep Shell out of Florida's Everglades.

Sincerely,

Terry Sader

PO Box 220499
Hollywood, FL 33022
305-923-3351



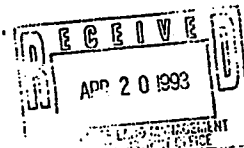
TERRY SADER

6290 Greenwich Drive, Suite 190
San Diego, CA 92122-3998
(619) 576-1010 • (619) 280-2211

I-311

April 15, 1993

Jackson District Office
Bureau of Land Management
411 Briarwood Drive
Suite 404
Jackson, Miss. 39206



Dear Mr. Abbey:

It is almost funny how one hand of the government is spending millions to clean up the everglades after years of misuse and now the other hand is promoting oil drilling in the same everglades. I urge you to not allow Shell to drill, we do not need to expose these fragile lands to further abuse. Our future is now let's not spoil it further. Thank you for your time.

Sincerely,

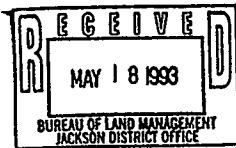
Robert Sadowski

Robert Sadowski
540 SW 10th Avenue
Fort Lauderdale, FL 33312-2544

I-312

P.O. Box 540518
Merritt Island, FL 32954
May 16, 1993

Bureau of Land Management
411 Briarwood, Suite 404
Jackson, MS 39206



Dear Sir or Madam:

I heartily support the drilling of an exploratory well on the Miccosukee Indian Reservation in Broward County, Florida.

My wife and I have lived on or near the water for many years and love nature's environment.

The proposed drilling is a "win-win" situation.

There should be little or no damage to the environment.

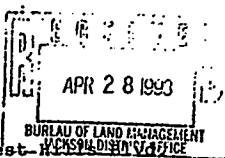
A number of states have benefited both financially and employment-wise from similar programs. Also,

Shell Oil is a very competent and reliable company.

Respectfully submitted,

Charles E. Salter, Jr.
Charles E. Salter, Jr.

I-313



2850 Forest-Woodbridge
Apt. #204
Coral Springs, Florida 33065
April 22nd, 1993

Jackson District Office
Bureau of Land Management
411 Briarwood Drive
Suite 404
Jackson, Mississippi 39206



To Whom It May Concern:

I think it is a waste of time for you to worry about drilling for oil in Florida. This is a lot of animals' and people's homes. You can't just come in here and kill what we've worked so hard to protect over the years. As you know when Marjorie Stoman Douglas came to Florida in 1912, the state was changing rapidly. More people were moving here, and alot of canals were built to drain out the Everglades. In the 1920's, Ms. Douglas decided to do something about it. She decided to save the Everglades and the Wild Animals. Don't you know there is only ONE EVERGLADES in the whole world. If you drill for oil here, and something happens, #1, 200,000,000 gallons of water will be ruined for every gallon of oil you spill, and #2, Millions of people and Me Won't have an Everglades in the future. Let's Face It: Floridians don't want you to drill for oil in the Everglades. If you do decide to drill for oil there, I feel real bad for your conscious. The woman who fought for the Everglades is still alive. If you drill for oil here, I will boycott your company's gasoline. I'm sure you don't want that to happen, especially since I fill up my car about 5 times a week. It's your decision, Not mine. Hopefully you'll make the right choice.



Sincerely Yours,

Harlee Samuels
Harlee Samuels



I-314

MENTAL FLOSS
ECO

Let Shell drill in Hell

By
ADRIAN AUMEN

Talk about outrageous. With all the predictions about how much it's going to cost us to clean up the Everglades and the water wars that could divide South Florida, Shell Oil Company still wants to drill in the middle of the Everglades.

The very idea of poking more holes in the already ailing system and increasing risks to wildlife and water supplies is nothing short of arrogant.

So is Shell's attempt to "greenwash" the plan by presenting an Environmental Impact Statement that uses outdated maps and information. It only skirts the surface of issues such as the effects on groundwater and future restoration plans.

The proposed drill site is at the edge of the Big Cypress National Preserve (located by the Collier/Broward line, north of Alligator Alley) and the world-renowned sawgrass marsh, a conservation area that keeps Broward and Dade counties from running out of water.

State rules prohibit direct drilling in the conservation area, so Shell came up with a way around it - by drilling at an angle. The drilling rig would be outside the conservation area, on land owned by the Miccosukee Indians (read: federal land). The end of the drill would be 4,700 feet east - smack dab in the conservation area, at 18,850 feet down.

Slick. The drilling rig would stand in a cattle pasture within 200 feet of a canal and only 1,000 feet from a pumping station that funnels water into the Everglades water catchment areas. Imagine what a hurricane could do with that setup. The area is also home to Florida

panthers, wood storks, Everglades kites, Everglades minks and, in the Shell study's own incriminating words, "other waterfowl" (sic).

Shell's tenacity would make you think it expects to find a pool of oil the size of Prince William Sound, but even the experts doubt there's much to be found. There's not much oil in Florida, and the oil that's here is of such poor quality that it's hardly worth refining.

Could it be worth losing the Everglades?

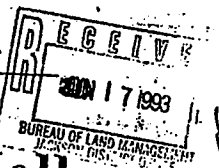
Shell admits that, if it finds oil, it's likely to seek more drilling. It also admits that spills are inevitable.

Exxon and other firms drilling nearby have been unable to prevent spills. Almost 163,000 gallons of crude oil and 120,000 gallons of plant-killing brine already have been spilled in the Everglades area. Unchecked, one gallon of petroleum can contaminate one million gallons of drinking water.

That's why about 300 South Floridians, and even some tourists, crammed a recent public hearing in Broward County to talk with Washington bureaucrats on the issue.

"Tell Shell to drill in Hell!" yelled some folks.

Others are cutting up their Shell credit cards and taking their business elsewhere. Not a bad idea.



What you can do
Unless something changes, the U.S. Department of the Interior is expected to approve Shell's plans soon. Besides cutting up your Shell card and boycotting the stations, here's some folks you can write: Or just mail them this column.

Bruce Babbitt
Secretary of the Interior
1849 C Street, NW
Washington, D.C. 20240
(202) 208-7150

Carol Browner
U.S. Environmental Protection Agency
401 M Street, SW
Washington, D.C. 20460
(202) 260-4700

Robert V. Abbey
District Manager of the Bureau of Land Management
Jackson District Office
411 Briarwood Drive
Suite 404
Jackson, MS 39206

Please don't let them drill in our WATER SUPPLY!

Sincerely, Ruth Samuels
PO Box 687
W Palm Beach FL 33402

I-315

4800 NW 73 Ave
Zanderwood, FL 33399
April 26, 1993

Dear Mr. Abbey,
We here in FL are concerned about the problem of drinking water. The Shell oil Co. should be denied a permit to drill in the Everglades. The Everglades is a fragile ecosystem that has been abused. Shell oil's proposed drilling is an additional threat and undeniable hazard.
Sincerely,
Mrs. Gertrude Sanders

I-316

Dear District Manager:

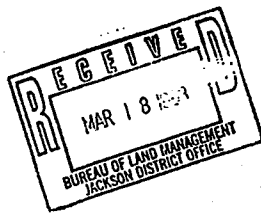
I am a concerned South Florida resident asking you to please stop Shell Oil Co. from exploratory drilling in the eastern Everglades.

May I remind you that this is a CONSERVATION area, where our fragile environment is supposed to be PROTECTED, not threatened by a company whose only purpose is to make a profit at the expense of our main source of fresh water.

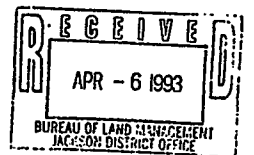
I am vehemently opposed to this drilling, and will do everything in my power to see that it is stopped.

Thank you for your time.

Lisa M Sannasardo
LISA MARIE SANNASARDO



I-317



Dear District Manager:

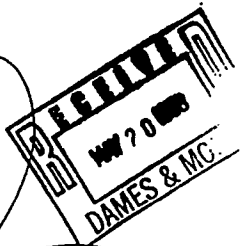
I am a concerned South Florida resident asking you to please stop Shell Oil Co. from exploratory drilling in the eastern Everglades.

May I remind you that this is a CONSERVATION area, where our fragile environment is supposed to be PROTECTED, not threatened by a company whose only purpose is to make a profit at the expense of our main source of fresh water.

I am vehemently opposed to this drilling, and will do everything in my power to see that it is stopped.

Thank you for your time.

Peter Sannasardo
PETER SANNASARDO

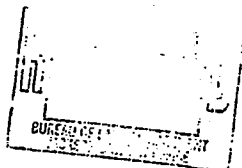


I-318

DON'T LET SHELL OIL DRILL!

April 19, 1993

Mr. Robert Abbey
Jackson District Office
U. S. Bureau of Land Management
411 Briarwood Drive
Suite 404
Jackson, MS 39206



Gentlemen:

Native Americans have a saying that they are the "caretakers" of Mother Earth and their philosophy is that it is mankind's responsibility to take care of the earth and her creatures for the next seven (7) generations.

It should be the Land Management's responsibility to protect the Everglades for generations yet unborn. If the Everglades was a patient, doctors would say it is already in critical condition. There is a delicate balance in the environment of the Everglades and MAN'S callousness, ignorance, greed and abuse are guaranteed to tip the scales. WHAT WILL SHELL OIL DO WHEN THEY ARE SITTING ON TOP OF A DEAD PLANET?

Men come and go. Mother Nature survives. Leave the Everglades alone, Mother Nature knows what she's doing.

Sincerely,

RC Sannasardo
RC SANNASARDO
1000 W. US HWY. 90
SUITE 100
FORT LAUDERDALE, FL 33316

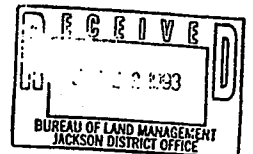
I-319

June 14, 1993

Patricia A. Scarborough
7107 Leighton Way
Orlando, FL 32822

Bureau of Land Management
Robert Abbey
411 Briarwood Dr. Suite 411
Jackson, Miss. 39206

Dear Mr. Abbey



Shell's proposed Everglades well endangers the entire Everglades ecosystem as well as South Florida's water supply. Drilling for tiny amounts of oil in environmentally sensitive regions will not provide for our children's energy or ecological future. Florida needs solar energy, not Shell Oil. Please prevent this proposed well from being permitted.

Sincerely,

Patricia A. Scarborough
Patricia A. Scarborough

I-320

I-321

JUL 6 1993

2400 N.W. 103 Ave.
Pembroke Pines FL 33026
July 1, 1993

Mr. Robert Abbey
District Manager of Bureau land management
411 Briarwood Dr.
Jackson Mississippi, 39206

Dear Mr. Robert Abbey

How dare you drill in
the Everglades! Animals
will be killed. Trees and plants
would be ruined, without
plants and trees there would
be no oxygen, without oxygen
nobody could breath. If
you drill oil all the water
would be polluted. How
could any human being
ruin so much of Nature?
just to make several doll-
ars? Thank you for your
time

Elizabeth Schane

Elizabeth Schane

Mr. & Mrs. Brian Scherf
1060 Tyler Street
Hollywood, Florida 33019

May 14, 1993

Robert V. Abbey
District Manager
Bureau of Land Management
Jackson District Office
411 Briarwood Drive, Suite 404
Jackson, MS 39206

Dear Mr. Abbey:

On behalf of our south Florida membership, Big Cypress Earth First! submits the following comments on the Miccosukee 3-1 Exploratory Well Draft Environmental Impact Statement (DEIS).

The DEIS was produced to fulfill the required mandates under the National Environmental Policy Act (NEPA). The DEIS scope of analysis is to include the direct, indirect, and cumulative impacts of the proposed action and alternatives (p. S-5). After considerable review it is our opinion that the DEIS falls far short of the mandates required by NEPA.

BACKGROUND The Everglades is one of the most threatened ecosystems in the world. It is also one of only two other places in the world to be designated an International Biosphere Reserve, a Wetland of International Importance, and a World Heritage Site. Biologists have described the Everglades as being on the verge of ecological collapse. Every major component of the Greater Everglades Ecosystem has been severely degraded from the Kissimmee River to Florida Bay. Only one-fifth of the Everglades historic watershed is relatively functional. This great ecosystem provides south Florida with our only source of drinking water, regulates our climate, attracts thousands of sportsmen and millions of tourists, and provides habitat for numerous endangered and threatened species. In essence, the survival and well-being of Everglades means the survival and well being of south Florida.

SCOPE OF ANALYSIS Consistently throughout the DEIS the study area is limited to 5 acre pasture site while the area of the proposed action is the Everglades ecosystem (p. 4-60). The affected environment is the Everglades ecosystem but Section 3.0 does not describe the how the ecosystem functions nor its natural boundaries. The analysis needs to be greatly expanded to include the historical Everglades watershed.

ALTERNATIVES The DEIS fails to consider the no action alternative. Evaluating the alternatives of an access road from the

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I-323

east, the west, and the north makes a mockery of the NEPA process. As the EIS process has gained sophistication the courts have held that a wide range of reasonable alternatives needs to be evaluated. How can readers evaluate the proposed action if there is no adequate basis line to compare it to? A complete analysis of the no action needs to be presented in the FEIS.

CUMULATIVE IMPACTS The DEIS fails to adequately evaluate cumulative impacts upon the Everglades ecosystem. Cumulative impacts are impacts likely to occur due to the proposed action or alternatives in combination with other past, present, and reasonably foreseeable future actions (p. 4-60). The DEIS evades this requirement completely. The Everglades has been degraded by the cumulative impacts of thousands of individual projects since the late 1800's. The fundamental issue debated here is not technology but the integrity of critically endangered ecosystem. The proposed action is analyzed in isolation from the rest of the ecosystem, treating it as if it was the only development in a pristine environment. When an agency proposes a single action it must be evaluated in context with all the cumulative effects of all past, present, and proposed actions in the same ecosystem.

There is no cumulative analysis of oil drilling or other negative impacts upon the Everglades. Only about one page (p. 4-60 & appendix 1) in the DEIS is devoted to the impacts of oil drilling. No cumulative analysis is presented. Cumulative impacts are likely to be significant when the hundreds of other past, present, and future wells are analyzed. The Final Environmental Impact Statement (FEIS) should contain the following detailed cumulative impact analysis:

1. Exploration impacts
2. Development impacts
3. Production impacts
4. Recovery impacts
5. A map showing the location of past and present dry holes, producing wells, capped wells, all oil exploration roads and trails, location of all pipelines, and tank and equipment areas in the Greater Everglades Ecosystem.

OIL SPILL RECORD The DEIS fails to disclose the oil spill record in south Florida. Over the last 20 years, 81 spills have been recorded with 163,000 of oil and 120,000 gallons of brine released into the environment. The FEIS should show the location and extent of each spill along with the date of each spill and description of environmental damage.

BISCAYNE AQUIFER Data about the location of the Biscayne aquifer is not accurate or current. The best available data needs to be used. The aquifer map in the DEIS dates from 1978. The 1992

Environmental Protection Agency (EPA) aquifer map and US Geological Survey (USGS) data shows the location of the Biscayne aquifer extending to the Broward - Collier county line. Therefore the drill site would be under the aquifer and not 5-10 miles away as alleged in the DEIS. The proposed action could contaminate the regions only "sole source" aquifer with a surface spill or subsurface leak of oil, brine, or toxic drilling fluids. To place our whole drinking water supply at risk for a relatively small amount of oil is insane.

Engineers at Dames and Moore or the BLM are not qualified to analyze the location of the Biscayne aquifer. This analysis should be conducted by EPA and USGS scientists. The results of an EPA-USGS determination of the status and location of the aquifer should be presented in the FEIS.

TRANSPORTATION OF OIL If the exploratory well struck oil, this oil would have to be transported most likely to Port Everglades. No analysis is presented in the DEIS of oil delivery systems. The most likely delivery system would be the Suniland pipeline. The pipeline is a connected action and must be analyzed. The pipeline runs from the Suniland area across Water Conservation Area 3 and presents a high probability of an oil spill. In fact, this pipeline is over 20 years old and has had 33 leaks. The FEIS should depict the location of the pipeline, locations of all leaks, the extent of the leak, dates, and description of environmental damage.

EVERGLADES RESTORATION Recently, the Army Corps of Engineers (ACOE) announced plans for a 2 year study that would result in radical changes to restore a more natural water flow to the Everglades. The Secretary of the Interior has also stated the government's high priority to Everglades restoration. The drill site lies in a transition area between the Everglades proper and the Big Cypress Swamp. Water would naturally flow from one area to the other in times of flood and drought. Everglades restoration plans may call for reestablishment of this hydrologic link. An exploratory well or potential production field may significantly impede restoration plans. No analysis or consultation with the ACOE about restoration plans was conducted in the DEIS. Immediate consultation with the ACOE is warranted and its results presented in the FEIS.

FLORIDA PANTHER The best available data on panther telemetry is not presented in the DEIS. The panther telemetry map used in the Florida Panther Draft Habitat Protection Plan (DHPP) (Fig. D-2) should be used minus the gum swamp label that covers the drill site area. This map clearly shows the drill site within the range of the panther. Both the DEIS and DHPP maps show a gap between two panther activity areas where more intense human activity and degraded habitat in the middle, has driven panthers away. Although, the area would be considered marginal panther habitat, these areas are

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important for dispersal of sub-adult male panthers and aid in the establishing new home territories and avoiding mortality from dominate males. Yet, the DEIS states that the increase in activity may discourage use of the area by young males (p. 4-55).

The US Fish and Wildlife Service is currently studying whether Critical Habitat Designation should be applied to the entire documented range of the Panther. If so designated, the proposed action would result in a jeopardy determination by the Service. The cumulative impacts upon the panther need to be analyzed in the DEIS. Panther habitat is being destroyed daily and the proposed action would cumulatively contribute to this trend and doom recovery efforts to save the panther from extinction.

OIL SPILL CONTINGENCY PLAN This plan (A-10) is inadequate. No reliable procedures have been developed to clean oil or other fluids from saw grass and muck soils. Further wildlife rescue centers in south Florida do not have the facilities or expertise to treat large numbers of contaminated wildlife. Survival rates among contaminated birds, reptiles, and mammals is extremely low. No provision in the plan is made to keep birds away from pooled oil or brine that is often mistaken for clean water. Wildlife then become entrapped in the goo and die.

In the event of a catastrophic spill, financial resources will be critical. Shell makes no guaranteed commitment of money or personnel. Shell should be required to post a one billion dollar bond at the time of application. Financial commitments by bonds or other means needs to be evaluated in the DEIS.

LOCAL AND STATE GOVERNMENT The state of Florida has opposed the proposed action because of the possibility of adverse impacts to plant and animal life, water supply, and the Everglades ecosystem. Recently the Governing Board of the South Florida Water Management District has approved a resolution opposing the exploratory well on the same grounds. Broward County opposes the exploratory well because of the threat of contamination to the Biscayne aquifer and will pursue legal action to stop the well.

SUMMARY The DEIS as written is only half complete. The geographic scope needs to be enlarged to cover the Greater Everglades Ecosystem. The cumulative impacts upon the Everglades, it's wildlife, and of oil drilling activity needs to be analyzed in detail. Because of the significant threat of contamination to the Biscayne aquifer and the critical condition of the Everglades, the Application for Permit to Drill should be denied.

Sincerely,

Brian and Rosalyn Scherf
Brian and Rosalyn Scherf

Mr. & Mrs. Brian Scherf
1060 Tyler Street
Hollywood, Florida 33019
August 11, 1993

Robert V. Abbey
District Manager
Bureau of Land Management
411 Briarwood Drive, Suite 404
Jackson, MS 39206

Dear Mr. Abbey:

Enclosed is our comments on the adequacy of the Miccosukee 3-1 Exploratory Well Draft Environmental Impact Statement (DEIS).

The DEIS was produced to fulfill the legal mandate of the National Environmental Policy Act (NEPA). Under NEPA the analysis of the proposed action and reasonable alternatives is to include the direct, indirect, and cumulative impacts (p. S-5). It is obvious after reviewing this document that the BLM continues it's long history of inadequate environmental review. As the draft is currently written it does not comply with the requirements of NEPA.

The most serious deficiency of the DEIS is its discussion of the Biscayne Aquifer. The Biscayne Aquifer has been designated by the U.S. Environmental Protection Agency as a "sole source Aquifer"--- south Florida's only drinking water supply. The aquifer is unconfined, highly permeable, and is vulnerable to surface water contamination according to the South Florida Water Management District SWIM Plan (p.38-39). The DEIS states that "local freshwater aquifers may be contaminated by leakage of drilling fluids or produced oil and by mixing groundwater between aquifers" (p.S-11). Yet the DEIS only devotes a few paragraphs in discussing the Biscayne Aquifer.

Under NEPA the DEIS is mandated to use the best available data. Data presented about the location of the Biscayne Aquifer is not accurate. The aquifer map presented was produced in 1978 by the U.S. Geological Survey (USGS). A more accurate aquifer map was prepared by the EPA and USGS in 1992 showing the western boundary of the aquifer extending to the Broward-Collier county line. Further research by analyst Jim Goldsich of the Broward County Office of Natural Resource Protection reveals that the aquifer currently extends within two miles of the drill site and not the five to ten miles alleged by the DEIS.

Since the Biscayne Aquifer is highly permeable and variable in size depending on rainfall, surface water flow, and withdrawal rates it is reasonable to assume that the aquifer may expand in the future. Several years of above normal rainfall would likely enlarge the size of the aquifer shifting it closer to the drill site.

I-326

Further, the DEIS did not analyze the potential impacts to the Biscayne Aquifer by several proposed Everglades restoration programs. The DEIS states that the proposed action and alternatives are to be evaluated in combination with other past, present, and reasonably foreseeable future actions (p.4-60). The Army Corp of Engineers has recently begun a two year study of restoration feasibility and costs. Second, Everglades restoration guidelines (SWIM) have been presented in the recent mediation settlement with sugar growers. Third, the Everglades Coalition has presented yet another comprehensive Everglades restoration plan. All of these plans propose to greatly expand the quantity of water flowing south through the Conservation Areas. Millions of acre feet of additional water in combination with years of above normal rainfall, would likely expand the size of the Biscayne Aquifer to the vicinity of the drill site or beyond. This reasonably foreseeable action is required to be evaluated by NEPA.

It would be absurd to spend over 700 million dollars under the court ordered SWIM plan to rid the conservation areas of farm pollution and then turn this endangered ecosystem over to the oil industry. The South Florida Water Management District and Florida state law (Chapter 18-2 FAC) explicitly prohibits exploratory or production drilling, and geophysical testing for oil and gas in the state owned water conservation areas as a means of protecting this sensitive area.

Contamination of the Biscayne Aquifer by drilling operations is a realistic possibility. To put south Florida's sole source of drinking water at risk for a relatively small quantity of oil is not only reckless but insane. Since man knows little of the hydrologic dynamics of the Biscayne Aquifer the prudent action is not to drill.

Considering the complex dynamics of aquifers, the best available scientific data needs to be presented. Engineers at Dames and Moore and the BLM are not qualified to analyze the dynamics and estimated location of the Biscayne Aquifer. Recent testimony and affidavits from hydrologists and other aquifer experts from the EPA and the USGS needs to be presented in the FEIS.

Everglades restoration efforts propose to restore the natural sheet flow of water. The drill site lies between the sawgrass Everglades and the Big Cypress Swamp. Historically surface water would intermix between the two areas. Restoration plans may call for inundation of the site to reestablish this natural system. Operation of an exploratory well and potential field development would likely impede future restoration plans of the area. Immediate consultation with all appropriate land management agencies needs to be conducted and the results published in the Final EIS.

The DEIS fails to adequately evaluate the cumulative impacts upon the Everglades ecosystem. Cumulative impacts are impacts likely to occur due to the proposed action or alternatives in

I-327

combination with other past, present, and reasonably foreseeable future actions (p. 4-60). The DEIS evades this requirement completely. Piecemeal decision-making as seen in the DEIS chips ecosystems to pieces little by little. This faulty process results in faulty decisions. No single action has destroyed the Everglades. It has been the cumulative effects of hundreds of projects that have brought the Everglades to the point of ecological collapse. The cumulative impacts of urbanization, agriculture, highway development, pollution, flood control, recreation, hunting, industrial tourism, mineral exploration, and other human activities are not analyzed. The proposed action is evaluated in isolation from the rest of the ecosystem, treating it like it was the only development in a pristine environment. Under NEPA the BLM is required to evaluate the proposed action in context with all the cumulative effects of all past, present, and reasonably foreseeable future actions in the same ecosystem. What is actually at stake is the integrity of the Everglades ecosystem, not merely conditions on a 5 acre pasture site.

The DEIS fails to consider other reasonable alternatives as required by NEPA. The "no action alternative" is not given serious evaluation as well as other feasible choices. For example, the reasonable alternative of using conservation easements and transfer of development rights was not evaluated. This alternative has the potential to provide the Miccosukees with substantial income while eliminating adverse environmental impacts; a win-win situation. To limit the alternatives to a road from the east, the west, and the north makes a mockery of NEPA. Federal courts have held that a wide range of reasonable alternatives need to be evaluated. The public cannot adequately evaluate the proposed action if there is no basis for comparison.

The Florida panther is in extreme danger of extinction. Further industrial activity and human encroachment cannot be tolerated. Panther telemetry maps used in the DEIS and the recently released Florida Panther Habitat Preservation Plan (FPHPP) clearly identifies the drill site as within occupied panther habitat. The DEIS fails to disclose that actual panther activity is under-represented because the locations represent only radio collared panthers which likely depict less than half of the wild population. Both the DEIS and the FPHPP show a gap between two large panther activity areas where the Miccosukee service plaza and drill site are now located. Increased human activity and destruction of native cover and prey in the general drill site area have created marginal habitat conditions.

The DEIS alleges that panthers are not known to utilize the area for any stage of their life cycle (p.4-55). Wildlife biologists would disagree. Although the area is considered marginal habitat, these areas are important for dispersal of sub-adult panthers and aid in establishing new territories and avoiding intraspecific aggression. The DEIS explicitly admits that the increase in industrial activity may discourage use of the area by young males. The DEIS alleges that the area is not routinely

I-328

utilized by panthers but panther telemetry conclusively indicates the opposite.

95

Increased human encroachment and resulting habitat destruction are primary causes of the decline of the panther. Robert C. Belden of the Florida Game and Fresh Water Fish Commission states, "the only reason the panther still remains in south Florida may be that, until recently, the Big Cypress Swamp/Everglades region was virtually impenetrable to humans. Only the most hardy individuals with specialized equipment could enter the area. When they did enter their range was limited by the amount of fuel that could be carried..." Petroleum operations are clearly an incremental form of habitat destruction. The Big Cypress National Preserve General Management Plan states, "Florida Panthers are believed to be sensitive to human intrusion into their habitat and the decline of the panther has been attributed to the loss of habitat quality as a result of increased hunting, ORV use, and other backcountry recreation; petroleum operations, road construction, agriculture, and urbanization, and other human activities."

According to the Florida Panther Recovery Plan, Indian lands are important to the recovery of the panther. Task 1317 of the plan states that the Florida Game and Fresh Water Fish Commission will work with the tribes to evaluate the deer status on the reservations and initiate management actions to enhance deer populations. Oil exploration and recovery operations would compromise these objectives.

According to the FPHP, panther habitat is being lost daily and the proposed action would contribute cumulatively to this trend and thwart habitat protection efforts. The proposed action would likely adversely affect the panther. Since the panther is on the brink of extinction, management actions should promote protection to maximum extent possible. Again, further industrialization of panther habitat cannot be tolerated.

Contrary to the impression given in the DEIS, oil spills are a common occurrence in oil exploration and production operations. Production activity may last for 20 years or more. The DEIS distorts the risks of oil, brine, and drilling fluid spills. It fails to disclose the oil spill record in south Florida. Over the last 20 years, 81 spills have been recorded resulting in 163,000 gallons of oil and 120,00 gallons of brine contaminating soil and water. According to the South Florida Water Management District a large number of leaks were discovered in the Suniland pipeline that crosses the conservation area causing alarm over water quality and habitat protection.

72

The final EIS should show the location and extent of each spill of oil, brine, and drilling fluids, the dates, amounts, and accurate description of environmental damage in south Florida including the Suniland pipeline.

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In summary, the DEIS does not adequately evaluate the serious potential environmental impacts of exploratory drilling and ignores common sense and the best available scientific data.

--Common sense would dictate not to drill in an ecosystem on the verge of ecological collapse.

--Common sense would dictate not to drill near a "sole source" drinking water aquifer.

--Common sense would dictate not to drill in the habitat of one of the rarest and endangered animals on earth.

--Common sense would dictate not to drill in an area where oil, brine, and drilling fluids cannot be adequately cleaned up from muck soils and sawgrass.

--Common sense would dictate to seriously evaluate other alternatives and cumulative impacts.

The document is highly biased in favor of the proposed action. This is to be expected since the BLM has a dismal record of environmental protection on lands that it administers according to a study by the Government Accounting Office. Land Management agencies perhaps represent the greatest threat to the continued existence of the Everglades. Every major development action initiated by these agencies has resulted in continued destruction and degradation of the Everglades. Citizens see the same mistakes made over and over again. The Public is cynical about this environmental review process and believe this to be a "done deal" and that the BLM will "rubber stamp" a Finding of No Significant Impact.

Roughly 99% of the public comment has been against the proposed exploratory well including overwhelming opposition from the Governor, Cabinet, South Florida Water Management District, Florida's congressional delegation, National Park Service, Broward County, environmental organizations, and others. Yet, the BLM struggles to justify its development dogma while denying common sense and biological facts.

Protection measures for the Everglades must be done soon and done right. There is no margin of error for the Everglades. DENY THE PERMIT TO DRILL!

Sincerely,

Brian + Rosalyn Scherf
Brian and Rosalyn Scherf

I-330

April 20, 1993

To Whom It May Concern:

In my recent studies I have realized the danger of the the presented idea to drill for oil in the Everglades. If this drilling occurs and the oil is detected the pipe line which will be used is completely intersecting with South Florida's water table. In the event of an accident during any point of piping, such as spills or leaks, will directly damage the entire water supply for the residents in South Florida.

21

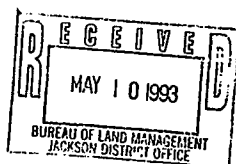
Because the chances of striking oil are so slim, the idea of drilling seems to be senseless. I am basically just a concerned citizen and causing such a dilemma over an area that will most likely not provide is money wasted.

I was a loyal Shell customer and until this idea is demolished I plan to take my business else ware, and I do believe I am speaking for more than just myself when I say that. Our environment is an important resource to preserve and putting it in a position of possible damage is simply ignorant. Thankyou for your time and I personally hope reconsideration will be thought about before action is taken.

Sincerely,

Carrie A Schick

Carrie A. Schick



I-331

Wildwood, FL May 5, 1993

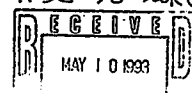
To: BLM
Jacksonville

Re: Shell's Drill
Site - Broward Co.

Shell Oil Company management (Houston) informed me that BLM solicits comments from the public with regard to a proposed well on The Miccosukee Indian Reservation in Western Broward county; also, that you have been furnished with a draft environmental impact statement (DEIS) by Dames + Moore Consulting of Boca Raton.

I am a retired petroleum engineer with 45 yrs. experience (33 w/ major company, 8 yr. USGS, and 4 1/2 yr. asst. prof U.S.L.). Hence I understand the risks, and procedures necessary to control: (1) the circulating drill-fluids, (2) salt water production (if any), and (3) sensing approach to abnormal formation pressures.

You may be assured that Shell has the staff with expertise to take care of such risks.



I-332

2.

I understand that this drilling location is "upland" grazing, relatively higher than "wet lands" and that Shell will use tight containment systems (perhaps as used offshore?) - Hence, minimum impact on environs.

As one Florida resident who appreciates the need for petroleum, with the best fuel quality and other valuable products (U.S. must import \$70 billion worth per year) - and Florida needs the royalty money. And this source of power is more safe than present, nuclear with bad byproducts to dispose.

I say, "Let Shell drill!"

P.S. If you would desire my review of the DEIS, and/or my opinion of conditions of the drill site with the rig in place, ready to drill - feel free to call me.
Yours truly, E K Schantz

I-333

May 12, 1993

Stephen G. Schorr
13856 York Court
Wellington, Florida 33414

Bureau of Land Management
411 Briarwood, Suite 404
Jackson, Mississippi 39206

Dear BLM:

I am writing you in regards to the proposal by Shell Oil Company to drill a well in the South Florida Miccosukee Indian Reservation. I believe this would benefit all parties involved.

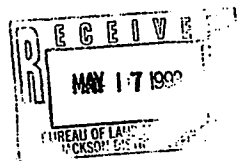
I know there are some concerns considering some short-term disturbances in the area to human and natural environments. These issues are of great concern to myself and my family. However, the knowledge I have pertaining to the area's groundwater leads me to believe there would be significant amount of time to effectively clean up any contamination, if it should occur. It is also my belief that necessary measures would be taken to protect any and all wildlife in the area. Especially the wildlife on the endangered species list.

I would like to believe that I am a concerned citizen when it comes to anything or anyone who wants to destroy our planet just to turn a buck. Actions such as these are despicable in my eyes, but, I just do not believe this is the case.

If you have any questions concerning this, or any other matter, feel free to contact me.

Sincerely,

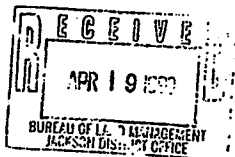
Stephen G. Schorr
Stephen G. Schorr



I-334

4/15/93

Land Management:
I can't believe anyone would even think of setting oil rigs into the state of Florida let alone our precious everglades. They are unique. NO NO NO we not allow it.
Mark Schantz



I-335

Ruth F. Schwartz
283 Capri Avenue
Ft. Lauderdale, FL 33308
(305) 491-3847

May 15, 1993

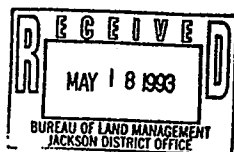
Gentlemen:

My husband and I are both against Shell Oil drilling in the Everglades.

The possibilities of ruining our beautiful resources are too great.

Our vote is "NO"!

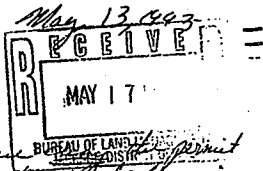
Yours truly,
Ruth F. Schwartz
Robert Schwartz



I-336

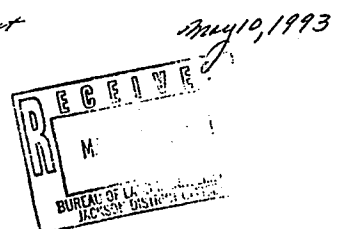
I-337

Mr. Robert V. Abbey
District Manager
Bureau of Land Management
411 Briarwood Dr. Suite 404
Jackson, Mississippi 39206



Dear Mr. Abbey,
We request that you permit application to Shell Oil Co. for drilling in the Everglades. The Everglades is in severe environmental distress and the health of this ecosystem is important to millions of people. The environmental impact statement funded by Shell Oil relies on outdated maps and erroneous conclusions.
Sincerely,
Joanne & Gerard Schubert

Bureau of Land Management
411 Briarwood
Suite 404
Jackson MS 39206

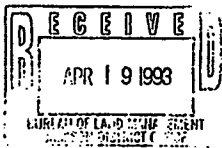


Dear Sir:-
I am writing you regarding Shell Oil Company for them to drill a well in South Florida on the Miccosukee Indian Reservation in Western Broward County.
Apparently the exploratory well on water resources and wildlife appear to be the greatest public concern.
I understand there could be some short term disturbance to a resident of the natural environment, but wouldn't interfere with water, air, vegetation, wetlands, or wildlife.
Investigations claim that important potable ground water sources such as Biscayne Aquifer and water conservation Area 3 are protected by distance.
Florida has been my home state since 1965 as a Shell Oil retiree, and I would be pleased to see them drill a well on the Miccosukee Indian Reservation.
Sincerely,
Bludis Schroeder

I-338

I-339

**DRAFT ENVIRONMENTAL IMPACT STATEMENT
APPLICATION FOR PERMIT TO DRILL
AN EXPLORATORY WELL
ON THE
MICCOSUKEE INDIAN RESERVATION**



Written comments on the Draft Environmental Statement are being accepted until May 18, 1993. Comments on the analysis and the preferred alternatives are specifically sought. Please provide your name and address. Comments should be sent to:

District Manager
Bureau of Land Management
411 Briarwood Drive, Suite 404
Jackson, Mississippi 39206

Attention: Robert V. Abbey

COMMENTS:
Being a resident of S. Florida for the past 25 years - I have seen first hand the destruction that has already occurred in our precious, "Everglades", i.e. construction of two landing 25, i.e. gas and oil stops and the increase of housing developments that are closing in on the outskirts of this environmentally sensitive area. I see no justification in Shell drilling (even for exploration) for oil. Why not put those monies into alternative energy sources i.e. wind, solar. We only have one Everglades! Let us leave it alone and maybe just maybe it will be there for future generations or it shall be extinct and then we'll only be able to read about it.
Concerned Citizen

Captain Jennifer Schubert
1931 SW 37th Ave
Ft. Lauderdale, Fla 33312

Ed. Lauderdale
April 93

Mr. Abbey,
Please reject Shell's application for drilling in the Everglades.

Sincerely,
M. Valendern
Schubert
Ed. Lauderdale



I-340

April 21, 1993

Jackson District Office
Bureau of Land Management
411 Briarwood Drive, Suite 404
Jackson, Miss 39206

Re: Shell Oil Drilling - Everglades, Florida

To whom it may concern:

It has come to my attention that Shell Oil Company is interested in drilling for oil in the Everglades of Florida. I urge you to oppose this action for it is a serious threat to the well being of the environment.

I was born in Florida and have lived here my entire life. The Everglades has always been one of the most treasured assets to our state. It serves as a sanctuary for the wildlife that lives there. It is a place of escape not only for the wildlife that makes it home but also for mankind to explore and learn from.

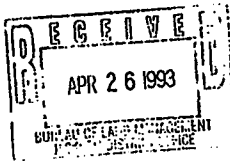
By allowing Shell Oil to invade this environment you will not only be threatening the Everglades, but opening the door to other oil drilling in the state of Florida. This must not be allowed!! The need of the many should not out weigh the need of the few!!

Please do not give Shell Oil permission to destroy the Everglades.

Thank you for your consideration in this matter.

Sincerely,

Patrice Shawe
Patrice Shawe
6630 Thornhill Ct.
Boca Raton, FL 33487



I-341

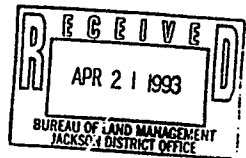
Jackson District Office
Bureau of Land Management
411 Briarwood Drive
Suite 404
Jackson, Mississippi 39206

To whom it may concern:

As a south Floridian who values the environmentally sensitive Everglades, I am adamantly opposed to Shell Oil's plans to drill for petroleum there. No number of precautions can assure that contamination will not eventually occur, due either to a natural or human-induced disaster. I urge you to make all efforts to thwart Shell's plans to exploit the Everglades. . . before it is too late for our wildlife, our economy, our water supply, and the preservation of the unique and natural beauty of the Everglades.

Very Concerned,

Kay Shoemaker

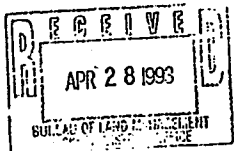


1-342



21830 Banyanwood Road
Boca Raton, FL 33433
April 19, 1993

Dear Mr. Robert Abbey,
We want to express our strong opposition to any oil drilling in the Everglades! We feel there has been enough damage done to the Everglades and do not think any permits can be made that there will be no accidents. You know how many such permits end up with accidents. We do not want our water in jeopardy.
We strongly urge you to vote against any drilling for oil in the Everglades!



Sincerely,
Paul and Marie Shuler

Mr & Mrs S Paul Shuler
21830 Banyanwood Rd
Boca Raton FL
33433

I-343

5790 Stirling Rd. Apt. 306
Hollywood, FL 33021
April 27, 1993

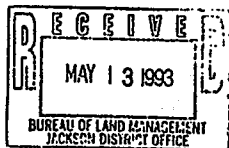
Dear Mr. Abbey,

Please do not permit Shell Oil Co. to drill for oil in the Everglades. The everglades is in tough shape as is and we need to restore it, not hasten its ruin. Among other reasons, this sets a bad precedent.

Very truly yours,

William Singer

I-344



571 S.W. 6th Street #718
Pompano Beach, FL 33060
May 13, 1993

Mr. Robert V. Abbey, District Manager
Bureau of Land Management
411 Briarwood Drive, Suite 404
Jackson, Mississippi 39206

Dear Mr Abbey:

I understand that you will soon be making the decision as to whether or not to grant the Shell Oil Company a permit to drill for oil in the Everglades. Of course I realize that you are well aware of the seriousness of this action. The Everglades is in severe distress now and needs restoration. Further risk is unwarranted and a very poor precedent.

It is entirely probable that the environmental impact statement funded by Shell Oil relies on outdated maps and erroneous conclusions.

Please deny the Shell Oil Company the right to drill for Oil in the unique ecosystem of our Everglades.

Sincerely yours,

Carolyn Slaton
Carolyn Slaton

26
85

I-345

Robert V. Abbey
District Manager
Bureau of Land Management
411 Briarwood Dr. Suite 404
Jackson, MISS 39206

Dear Sir:

I am a concerned college student from Broward Community College in Ft.Lauderdale Florida, writing to you with regard to the fact that Shell Oil Co. is eventually going to begin drilling in an area west of me known as the Florida Everglades.

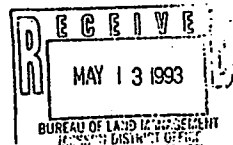
Now I understand that there are some hazards to the natural environment which exists in the everglades and also hazards to the groundwater that I drink. To my knowledge the real problem does not lie with the actual drilling of the oil, but with the transporting of the oil, which to the best of my knowledge is where most spills occur.

I am curious to know what you are doing Mr. Abbey, to make sure that Shell is taking the necessary safety precautions to ensure that the transporting of the oil is not going to endanger the environment and groundwater.

Sincerely,

Jason Slaughter
6161 SW 51st Ct.
Davie, FL 33314

21



I-346

April 27, 1993

Mr. Robert V. Abbey
District Manager
Bureau of Land Management
411 Briarwood Drive Suite 404
Jackson, Mississippi 39206

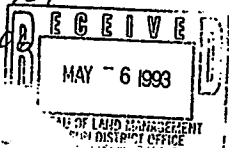
Dear Mr. Abbey,

Please deny the application of Shell Oil Company to drill for oil in the Everglades. The Everglades needs restoration - not further distress, since the Everglades is vital to life in South Florida. Drilling for oil so close to our source of water is so risky - too risky, especially since the permit is based on old, outdated maps and data. The risks far outweigh the possible benefits. Please deny this.

4047 NW 115 Ave.
Coral Springs
FL 33065

Sincerely,

Carol Smith
Carol Smith

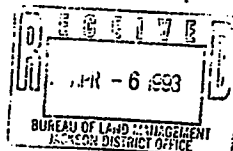


26

85

22

I-347



Dear District Manager:

I am a concerned South Florida resident asking you to please stop Shell Oil Co. from exploratory drilling in the eastern Everglades.

May I remind you that this is a CONSERVATION area, where our fragile environment is supposed to be PROTECTED, not threatened by a company whose only purpose is to make a profit at the expense of our main source of fresh water.

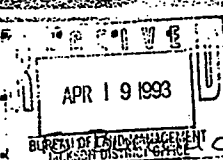
I am vehemently opposed to this drilling, and will do everything in my power to see that it is stopped.

Thank you for your time.

James G. [Signature]

I-348

I-349



April 15, 1993

Bureau of Land Management

I am writing to let you know that I am strongly opposed to the plan that would allow Shell oil to drill for oil in the Everglades. Our country's beauty is slowly dwindling away all in the name of what many call "progress." This type of progress is not what we need. All the oil company's are worried about is money!!! How much profit can they get out of this. They say that there are safeguards to prevent spills or damage which could be caused by a spill. Well no safeguard is 100% guaranteed. I want my children and my grandchildren to be able to enjoy the Everglades as they are today. I don't want them dotted with oil rigs or blackened by a spill. Say no to oil drilling - preserve the Everglades.

Sincerely -
Danne Parrott Spook
166 Elmway
Cooper City, FL 33026

NO DRILLING!

MENTAL FROM ECO

Shell's Stark
209 Arlington Rd
W Palm Bch FL
33405

Let Shell drill in Hell

By
ADRIAN AUMEN

Talk about outrageous. With all the predictions about how much it's going to cost us to clean up the Everglades and the water wars that could divide South Florida, Shell Oil Company still wants to drill in the middle of the Everglades.

The very idea of poking more holes in the already ailing system and increasing risks to wildlife and water supplies is nothing short of arrogant.

So is Shell's attempt to "greenwash" the plan by presenting an Environmental Impact Statement that uses outdated maps and information. It only skirts the surface of issues such as the effects on groundwater and future restoration plans.

The proposed drill site is at the edge of the Big Cypress National Preserve (located by the Collier/Broward line, north of Alligator Alley) and the world-renowned sawgrass marsh, a conservation area that keeps Broward and Dade counties from running out of water.

State rules prohibit direct drilling in the conservation area, so Shell came up with a way around it - by drilling at an angle. The drilling rig would be outside the conservation area, on land owned by the Miccosukee Indians (read: federal land). The end of the drill would be 4,700 feet east - smack dab in the conservation area, at 18,850 feet down.

Slick. The drilling rig would stand in a cattle pasture within 200 feet of a canal and only 1,000 feet from a pumping station that funnels water into the Everglades water catchment areas. Imagine what a hurricane could do with that setup. The area is also home to Florida

panthers, wood storks, Everglades kites, Everglades minks and, in the Shell study's own incriminating words, "other waterfowl" (sic).

Shell's tenacity would make you think it expects to find a pool of oil the size of Prince William Sound, but even the experts doubt there's much to be found. There's not much oil in Florida, and the oil that's here is of such poor quality that it's hardly worth refining.

Could it be worth losing the Everglades?

Shell admits that, if it finds oil, it's likely to seek more drilling. It also admits that spills are inevitable.

Exxon and other firms drilling nearby have been unable to prevent spills. Almost 163,000 gallons of crude oil and 120,000 gallons of plant-killing brine already have been spilled in the Everglades area. Unchecked, one gallon of petroleum can contaminate one million gallons of drinking water.

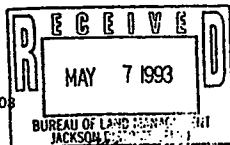
That's why about 300 South Floridians, and even some tourists, crammed a recent public hearing in Broward County to talk with Washington bureaucrats on the issue.

"Tell Shell to drill in Hell!" yelled some folks. Others are cutting up their Shell credit cards and taking their business elsewhere. Not a bad idea.

I-350

I-351

FRANK H. STAUB
925 PALM WAY
NORTH PALM BEACH, FLORIDA 33408



Bureau of Land Management
411 Browardwood Suite 404
Jackson, M.S. 39206

Gentlemen,

In view of the recommendation of Dames and Moore Consulting Co in Bacon Ration that the proposal to drill a well on the Indian Reservation in Broward County, Florida will not be detrimental to the environment, I urge you to approve the proposal promptly.

The benefits to the overall economy and especially to the Indian Reservation and its inhabitants justify this action.

Sincerely yours
F.H. Staub

Dear Mr. Abbey,

As an environmental advocate I challenge the request for Shell Oil Company a permit to drill for oil in the Everglades. The Everglades is in severe distress now, and needs restoration. Further risk is unwarranted and extremely poor precedent. The Everglades is a unique ecosystem, its health affects the water supply of millions of people, the climate, wildlife and the economic system of South Florida. The environmental impact statement funded by Shell Oil relies on outdated maps and erroneous conclusions. I urge you to reject this proposal. Sincerely, Shelia Skindberg, 2450 Ashmont Ave, Tampa, FL 33607

26/85

I-352

RECEIVED
APR 29 1993
BUREAU OF LAND MANAGEMENT
JACKSON DISTRICT OFFICE

We are
against
any and
all drilling
in the So Fla.
Everglades area
including near
Alligator Alley.

M. Mr. Stentz

I-353

Carol Stern
10812 NW 26th St
Sunrise FL 33322

April 23, 1993

RECEIVED
APR 26
BUREAU OF LAND MANAGEMENT
JACKSON DISTRICT OFFICE

Robert V. Abbey
District Manager
Bureau of Land Management
411 Briarwood Dr
Jackson, Mississippi 39206

Dear Sir,

I am writing to protest the fact that you are allowing Shell to drill an oil well in the Everglades. The groundwater in the Biscayne Aquifer is South Florida's only source of water. Not only would there be danger of water pollution from the drilling itself, but there is an even greater risk of pollution in transporting the oil from the well to Port Everglades and the refineries. Shell has not even responded to questions regarding the transport of the oil, let alone responded intelligently and responsibly.

I realize that our economy is based on oil, and I know the oil wells have to go somewhere. But our lives are based on water. There have been too many spills on existing wells. There has been too much pollution from the land fills down here. An area called Sunshine Ranches has carcinogens in their water already, and apparently, the City of Sunrise is having problems with our water also. The last thing we need down here is yet another source of water contamination in our water. Please, Please don't let Shell Oil do this.

Carol Stern

I-354

Dr. Mr. Abbey,

4-21-93

I attended the public hearing on the everglades issue. I personally feel that all the people present showed legitimate concerns. It is a concern to me that in the report the transportation of oil from the well site was not mentioned. I believe that panthers lives will be in danger as well as the poor birds. The everglades is a beautiful place and I do not find it fair for Shell to use it as a profit. It belongs to everyone not just them.

SARA STERN

RECEIVED
APR 26 1993
BUREAU OF LAND MANAGEMENT
JACKSON DISTRICT OFFICE

I-355

May 12, 1993

Robert V. Abbey
District Manager
Bureau of Land Management
411 Briarwood Drive Suite 404
Jackson, Miss. 39206

Dear Mr. Robert V. Abbey,

My review of the Summary Report of the Environmental Impact Statement - Shell Western & P. Inc. Mississippi 3-1 Exploratory Well leads me to conclude that drilling this exploratory well would not have significant impact on air, water, vegetation, wetlands or wild life and therefore I am suggesting that the Bureau accept the EIS and issue a permit for drilling. I feel that it is essential to continue efforts to increase our petroleum reserves and our future energy requirements will demand continuing efforts of Exploration and production to assure adequate petroleum supplies.

Sincerely,

Henry L. Seton
Shell Point Village
610 Coquina Ct.
Ft Myers, FL 33908

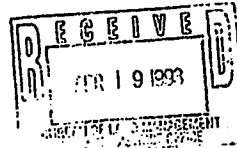
RECEIVED
MAY 17 1993
BUREAU OF LAND MANAGEMENT
JACKSON DISTRICT OFFICE

I-356

4/28/93
Dear Mr. Abbey,
Please do not permit The
Shell Oil Co. to drill for oil
in our fragile Everglades
ecosystem. Thank you!
Joanne Stenerson

I-357

JACKSON OFFICE
BUREAU OF LAND MANG
411 BRIARWOOD DR
#404
JACKSON, MISS
39206



AL STEWART
PO 39614
Ft. Lauderdale, FL
33339

DEAR SIR. (FOR THE MILLIONTH TIME)
PLEASE DO NOT DRILL FOR
OIL IN THE EVERGLADES. THE HOUR
IS LATE. THE AGE OF THE AUTO-
MOBILE IS DEAD. YOU ARE KICKING
AN ALREADY DEAD PLANET. IF YOU
WANT TO GO TO HELL SO BAD WHY
DON'T YOU JUST GO NOW.
YOU ARE RUINING YOUR
CHILDREN'S AIL.

AL STEWART

P.S. AFTER ALL THIS-
HOW COULD YOU CONSIDER SUCH A THING?
I FIND IT UNBELIEVABLE!
LIKE DEVILS & HELL!

I-358

4-28-93
To Whom It May Concern:
It's inconceivable to me that,
drilling in The Everglades, under
any circumstances is being considered
by anyone other than Shell or any
other entity considering profit, only
long intelligence, conscience and/or
concern for humanity, the world
and the universe. Please H. Storch
DO THE RIGHT THING!!!
Diana H. Storch
3801 NE 30TH AVE
Lighthouse Pt FL 33064

I-359

DON'T LET SHELL OIL DRILL!

April 19, 1993

Mr. Robert Abbey
Jackson District Office
U. S. Bureau of Land Management
411 Briarwood Drive
Suite 404
Jackson, MS 39206

Gentlemen:

Native Americans have a saying that they are the "caretakers" of Mother Earth and their philosophy is that it is mankind's responsibility to take care of the earth and her creatures for the next seven (7) generations.

It should be the Land Management's responsibility to protect the Everglades for generations yet unborn. If the Everglades was a patient, doctors would say it is already in critical condition. There is a delicate balance in the environment of the Everglades and MAN'S callousness, ignorance, greed and abuse are guaranteed to tip the scales. WHAT WILL SHELL OIL DO WHEN THEY ARE SITTING ON TOP OF A DEAD PLANET?

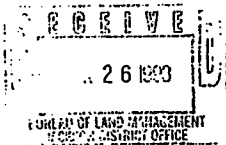
Men come and go. Mother Nature survives. Leave the Everglades alone, Mother Nature knows what she's doing.

Sincerely,

Joanne Stenerson

I-360

I-361



DON'T LET SHELL OIL DRILL!

April 19, 1993

Mr. Robert Abbey
Jackson District Office
U. S. Bureau of Land Management
411 Briarwood Drive
Suite 404
Jackson, MS 39206

Gentlemen:

Native Americans have a saying that they are the "caretakers" of Mother Earth and their philosophy is that it is mankind's responsibility to take care of the earth and her creatures for the next seven (7) generations.

It should be the Land Management's responsibility to protect the Everglades for generations yet unborn. If the Everglades was a patient, doctors would say it is already in critical condition. There is a delicate balance in the environment of the Everglades and MAN'S callousness, ignorance, greed and abuse are guaranteed to tip the scales. **WHAT WILL SHELL OIL DO WHEN THEY ARE SITTING ON TOP OF A DEAD PLANET?**

Men come and go. Mother Nature survives. Leave the Everglades alone, Mother Nature knows what she's doing.

Sincerely,

Grace E. Sutton

April 20, 1993

Jackson District Office
Bureau of Land Management
411 Briarwood Drive
Suite 404
Jackson, MS 39206

Andrea Sturzen
501 S.W. 15 St.
Ft. Lauderdale, FL 33315
305-760-7605

RE: Proposed drilling for oil in Everglades by Shell Oil

To Whom it May Concern:

I find it difficult to believe that this issue has gone this far! I was born and raised in South Florida and hope to be able to raise my own children here someday. If Shell Oil is permitted to drill for oil in our Everglades, it is only a matter of time before one or a series of accidents renders our water undrinkable.

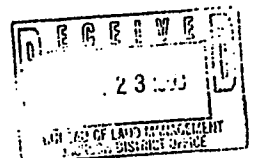
I have been told over and over again about all the precautions that will be taken to prevent contamination of the environment. It does not matter because eventually the unforeseen disaster will come and all of Shell's precautions will not stand in the way.

If this drilling is stopped, Shell oil will continue to prosper and go on to its next pursuit; if the drilling is allowed, we can all say goodbye to the Everglades as we know it. We will also be forced to find alternative sources of water.

Please wake up and SAY NO to Shell.

Very earnestly,

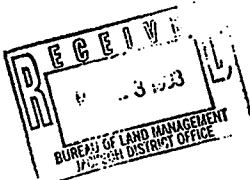
Andrea Sturzen
Andrea Sturzen



I-362

I-363

April 29, 1993



Mr. Robert V. Abbey
District Manager
Bureau of Land Management
411 Briarwood Drive Suite 104
Jackson, Mississippi 39206

Dear Mr. Abbey:

I am dismayed to learn that Shell Oil Company has applied for a permit to drill for oil in the Everglades. This is a unique ecosystem and its health affects the water supply of millions of people.

The Everglades is in severe distress now and badly needs restoration. Further risk is unwarranted and poor precedent.

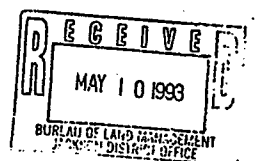
Furthermore, the environmental impact statement funded by Shell relies on outdated maps and erroneous conclusions.

Very truly,

Grace E. Sutton
Grace E. Sutton (Mrs. T.D.)

2809 NE 10th Avenue
Fort Lauderdale, FL 33334

Robert V. Abbey
District Manager
Bureau Of Land Management
Jackson District Office
411 Briarwood Drive, Suite 404
Jackson, Miss. 39206



Dear Mr. Abbey,

Thank you for forwarding the draft on Environmental Impact Statement dated March 8, 1993 to me.

I found it to be most interesting and informative and I agree with your findings that there would be no significant impact on water, air, vegetation, wetlands or wildlife. Also, that water bodies would be protected by both distances and barriers.

The DEIS is a very complete and comprehensive study and I urge your department to grant a permit for exploratory drilling to Shell Western E & P, Inc.

I would appreciate your keeping me informed by forwarding the final and complete summary of the document to me. I thank you for keeping me informed.

Sincerely,

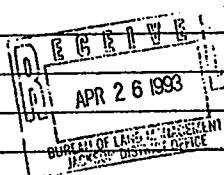
John Szabo
John Szabo

I-364

4/21/93

Dear Sir,
Please do not
allow drilling in the
Everglades.
Thank you

Sincerely,
Jack & Mary Tague
310 SE 12 Ave.
Pompano Beach, FL 33060



I-365

Jackson District Office
Bureau of Land Management
411 Briarwood Drive
Suite 404
Jackson, Mississippi 39206

To whom it may concern:

As a south Floridian who values the environmentally sensitive Everglades, I am adamantly opposed to Shell Oil's plans to drill for petroleum there. No number of precautions can assure that contamination will not eventually occur, due either to a natural or human-induced disaster. I urge you to make all efforts to thwart Shell's plans to exploit the Everglades. . . before it is too late for our wildlife, our economy, our water supply, and the preservation of the unique and natural beauty of the Everglades.

Very Concerned,

Pauline Taisian
Taisian

I-366

May 1, 1993

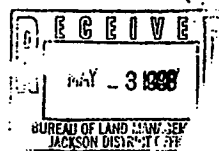
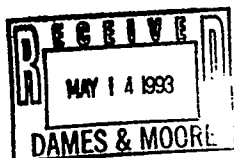
Dear Mr. Abbey:

I have just learned that the US Bureau of Land Management is going to make a decision as to whether or not to allow Shell Oil to drill in the Everglades! That a DREADFUL thing that would be!

Our state is precious and drilling in that sensitive part would be violating our need to protect it.

Please do not allow this!

Sincerely,
Elizabeth Leeds Tait
(Elizabeth Leeds Tait)



I-367

1080 N.W. 74 Terrace
Plantation, Fla. 33313
April 17, 1993

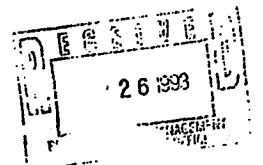
Jackson District Office
Bureau of Land Management
411 Briarwood Drive Suite 404
Jackson, Mississippi 39206

Dear Sirs:

As a highschool senior at Plantation high and a resident of South Florida, I am extremely against any oil drilling in the Everglades. The act of oil drilling will prove itself detrimental to the Everglades wildlife's existence. Our wildlife habitats in the Everglades are rapidly depleting. The small portion that is still remaining is vitally important to the wildlife as well as the citizens of South Florida. We need to preserve what is left. If an oil spill should occur this could demolish hundreds of animals as well as their habitat. Please do not commit an unnatural act as to destroy wildlife and our beautiful Everglades!

Sincerely,

Kristen Talton
Kristen Talton



I-368

I-369

Jackson District Office
Bureau of Land Management
411 Briarwood Drive
Suite 404
Jackson, Miss. 39206

MAY - 3 1993
BUREAU OF LAND MANAGEMENT
JACKSON DISTRICT OFFICE

To whom it may concern:

It has come to my attention that Shell would like to start oil drilling in the Everglades, and that this issue must be voted on. I urge you to vote against the oil drilling. Not just for the preservation of the Everglades, but for the water that it supplies South Florida.

I live in Unincorporated Fort Lauderdale. This is only 10 miles west from the future drilling site. I also do not have city water, I have well water. This water comes from a water supply under the ground. My fear with the drilling is that it will contaminate my water supply.

As a concerned citizen, I ask of you, please when it comes time to vote; vote against the drilling. If not just for the beauty of the Everglades, for the people that benefits from her water supply.

Respectfully yours,

The Taylor Family

To Whom It May Concern:

As a past resident of Louisiana, one of the major oil states, I have seen at first hand to what lengths the oil industry goes to protect the environment. Those who want to stop drilling are uninformed and clearly do not know what they are talking about.

If they are worried about the water supply - they should have worried years ago - Canal Springs and other cities have polluted water already.

There is plenty of proof that the oil industry is good for the ecology. For offshore Louisiana, the rigs and platforms have successful marine life and shrimp.

For your information, I do not work for an oil company or any oil related industry. Let Shell drill. (over)

Carole Taylor

I-370

I-371

April 30, 1993

Robert Abbey
Jackson District Office
Bureau of Land Management
411 Briarwood Drive
Suite 404
Jackson, Mississippi 39206

RECEIVE
MAY 10 1993
BUREAU OF LAND MANAGEMENT
JACKSON DISTRICT OFFICE

Dear Robert,

Reference is made to Shell Western's plans to drill an exploratory oil well in the Everglades.

I am a Florida resident, a taxpayer and an avid outdoorsman. My family has lived in South Florida since the late 1950's. We have seen the growth and subsequent change. Of course most change is good, but some does not give the benefits anticipated in the drawing board stages. Many of these plans affect the environment in a negative way. I believe drilling in the Everglades should be classified similarly: some good, but mostly not. It is a tremendous risk in the event of a spill. An oil spill in the Everglades would make the 'Valdez' look like child's play.

I belong to a couple of South Florida 'outdoor type' clubs. It has been made painfully obvious there is some concern about the use of airboats. This is partially due to the oil a boat may leak. An oil drilling leak would be catastrophic in comparison.

Previous request to drill in the Florida Keys have been denied. You should not consider a plan to drill in the Everglades based upon many of the same arguments.

The damage from a catastrophic disaster would have a far greater impact in an 'enclosed' area such as the Glades. Even the equipment necessary to clean up a potential spill would leave a path of destruction.

In closing I firmly believe that Shell Western's and any other subsequent requests should be denied.

I appreciate your consideration of this correspondence.

Very Truly Yours,

William Terry
P.O. Box 282
Boca Raton, Florida 33429

P.S. Was a Department of the Interior Environmental Impact study done? If so, where can it be found so the public can review it?

c: Governor Lawton Chiles
Florida Game and Fresh Water Fish Commission

Tell these people to research the information and go to Louisiana and Texas and talk to the people there, instead of passing their ignorance out for everyone to see. Ex oil industry employees are better and will say anything. So be careful. C.J.

I-372

Roderick Tirrell
5431 NE 25th Ave.
Ft. Lauderdale, FL 33308

May 12, 1993



Mr. Robert V. Abbey
District Manager
Bureau of Land Management
Jackson District Office
Jackson, Mississippi 39206

Dear Mr. Abbey,

I am again responding to your agency's effort to grant SWEPI a permit to drill an exploratory well in the Miccosukee range of water conservation area-3 (WC-3). The comment period should be extended from thirty to ninety days.

Impacts

The DEIS does little to address the questions I raised to you in my letter of May 11, 1992. The problems and issues in most cases are answered with "will not significantly impact".

This draft does not even consider the Everglades Restoration Project which may very well change the hydrology of the entire area. It is in conflict with the testimony of local experts in its findings. It ignores the Florida Executive Order banning commercial development in the Everglades Water Conservation Areas. It uses an outdated map (1978) of our aquifers although a newer and more comprehensive map (1987) was readily available. The DEIS claims the eastern edge of the Biscayne Aquifer was more than ten miles from the exploratory drill site. The newer, more comprehensive map shows otherwise.

The DEIS ignores Florida's tourism economy and again claims no significant impact. The drastic effect this well could have upon local ecology could very well affect future tourism in the Everglades.

The DEIS disregards the Sole Source Designation of the Biscayne Aquifer in the Clean Water Act (sect 1424 (E)) and its rating as a Stream Flow Source Zone.

The DEIS ignores the cumulative impacts upon the resource already strained by agricultural runoff, development, habitat destruction, pollution, drought, storms, and the Army Corps of Engineers Drainage System. It is a piecemeal study of isolated actions intent on ignoring the ecosystem as a whole while promoting the incremental destruction of the resource. Introduction of roads, construction, service stations, trash, and toxic elements will all have no significant impact? This documents purposely ignores our nation's energy needs and does so by claiming that field development is not proposed, probable, or foreseeable. Is SWEPI spending \$5 million on exploration with no goal of production?

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I-373

No Action Alternative

The "No Action Alternative" that is intentionally eliminated in this document was identified in the scoping process. Section 1502.14 (d) of NEPA requires a No Action Alternative. Why is this project exempt from that section of NEPA law? Although the DEIS claims to address significant issues identified in the scoping process, it overlooks energy conservation and renewable energy resources.

Should SWEPI be exempted from having to consider alternatives to this project? This development impacts one of the most sensitive resources on earth and will do little to satiate our appetite of 16,000,000 barrels of oil per day. Should SWEPI be relieved from having to consider alternatives because it might reduce our dependency on foreign oil? Encouraging private development of oil and gas reserves present a facade to national energy policy. The DEIS fails to evaluate but one means to increased energy dependence. The necessity to consider only drilling alternatives is irresponsible and is based only on the leaseholders' objectives.

Spill Contingency Plans

The Spill Contingency Plan is short-sighted, incomplete, and deficient. Section 4.5 (B) says a spill will be controlled by using dirt, boards, absorbent, hay, and straw.

The use of chemicals agents Oil Herder and Elastol seem to be most concerned with being able to refine and market recovered crude. Where is the chemical analysis of the breakdown of these agents? What effect will these agents have upon sensitive native flora?

Air Quality

How will this well discharge and monitor particulates? What monitoring will be used to measure the output of volatile organic compounds and heavy metals?

Wastes

Where and at what volume will drilling fluids be injected into the boulder zone and at what levels will contaminants be allowed in the injected fluids? Regarding 40 CFR 1465.23 and 40 CFR 146.24, where is the demonstration of mechanical integrity, the observation of injection pressures, flow rate and cumulative volume?

The Floridian and Gray Limestone Aquifers are treated as waste dumps rather than future repositories of potable water.

Drill cuttings will be spread on an upland area of the Miccosukee Reservation. Are these cuttings inconsequential and resistant to runoff during heavy precipitation?

Noise

Environmental consequences concerning noise are incomplete. Impacts are assessed on low constant diesel engine noise, when in fact, noise generated from a conductor casing drive hammer operation can be up to 40 decibels 1.74 miles (9200 ft.) from a rig in the preserve (4-19). Sharp, piercing, irregular, high-frequency noise and their effects upon wildlife should be studied further.

Abandonment

Where will SWEPI be in the event of abandonment and plugging should this

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I-374

exploratory well be unsatisfactory? What assurance will Floridians have in the event of a future casing crack and leak? What will SWEPI do in the event of transitional movement of wastes? Where are the contamination assessments regarding abandonment?

Wetlands

The Everglades has been designated a World Heritage Site, International Biosphere Reserve, and Wetlands of International Importance. Executive Orders 11990 and 11988 were enacted to prevent development in wetlands and floodplains. These safeguards to the wetlands and public welfare are glossed over in this document. They should be given thorough, comprehensive examination.

The vegetation report for Appendix A-5 was conducted in late fall of 1989; an unusually dry season. Hydrology and vegetation should be re-examined and a revised jurisdictional determination should be performed that may involve reclassification of the vicinity's vegetation.

Baseline health of the Everglades (pre-1900's) should be analyzed so we can measure the result of all cumulative impacts.

Safety

Nowhere in the DEIS is Shell Oil Company's record of safety violations mentioned. The Company has paid tens of millions of dollars in fines in at least three cases in the United States alone. One facility had two separate accidents resulting in 14 injuries and one death. Shell is currently being sued for illegal discharge in California and their own records show continued and repeated violations of water discharge permits.

Shell's record speaks for itself, yet it wants to come to one of the most sensitive areas on the planet for its exploration. Its rig may have all the latest technology and enclosed safety systems. State-of-the-art technology doesn't make this venture risk free. The decline of avian species and the current demise of Florida Bay present major problems without this project. The Port of Valdez was considered a state-of-the-art facility with comprehensive spill plans and safety regulations that could contain any spill.

Conclusions

Please reconsider the No Action Alternative. The security of our water supply, wildlife, and heritage cannot be guaranteed. A very small amount of conservation would save more oil than this area will ever supply. This is the hope for Florida. We can always consume more, but can we consume more wisely and efficiently. Maybe this way we can save something for the next generation.

I hope you will back Secretary Babbitt's promise for Everglades restoration. Please start by denying this permit. Thank you.

Sincerely,

Roderick Tirrell

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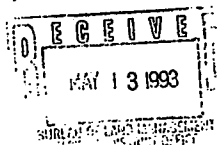
13

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I-375

1000 Kings Hwy., Unit 442
Port Charlotte, FL 33980

May 11, 1993



Bureau Of Land Management
411 Briarwood, Suite 404
Jackson, MS 39206

Subject: Proposed Exploratory Well
Miccosukee Indian Reservation
Broward County, FL

Dear Sir Or Madam:

The conclusion of the DEIS covering Shell's proposal to drill the subject exploratory well appears to be accurate and complete.

The writer is in total agreement with the opinion that any disturbance to the environment would be minimal and short-term and that potable water sources and wildlife populations would not be significantly affected.

We urge you to permit this project to go forward.

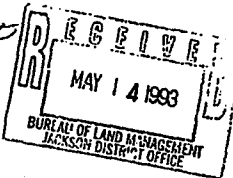
Sincerely yours,

Joseph L. Titus

I-376

5/11/93

Jackson District Office
Bureau of Land Management
411 Briarwood Drive
Jackson, Miss. 39206



To Whom It May Concern:

It is unconscionable that any oil company would consider drilling in the (OUR) Everglades.

How long and how loud do we, the people with no uttered notice, have to complain? What must we do to convince special interest groups to preserve what precious natural habitat this state and country have left. In order to make an impression, does it have to be too late?

Please, do not allow any further desecration of what beauty and natural resources we have left.

Yours truly,

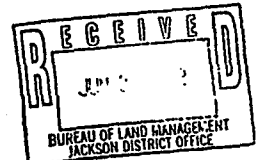
Yvette Trepper

Yvette Trepper
2810 N. E. 32nd Court
Pompano Beach, FL 33062

I-377

June 22, 1993

Robert V. Abbey, District Manager
Bureau of Land Management
411 Briarwood Drive
Suite 404
Jackson, MS 39206



Dear Mr. Abbey:

I understand that from ~~(now on)~~ now until November you will be deciding whether or not to issue Shell Oil a permit to drill an exploratory well in the Florida everglades. I am opposed to this plan because oil exploration is harmful to the environment and threatens the existence of the plant life and animal life in the area. Even though the proposed area is not within Everglades National Park, it is still in the "historic" everglades. Our national parks should be preserved. As a concerned citizen, I am requesting that you deny Shell Oil the permit to drill for oil in the Florida everglades.

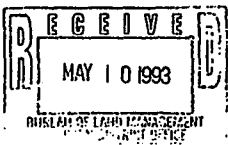
Sincerely,

Peter Talk

Peter Talk
145 West 86th Street
Apt. #2B
New York, NY 10024

I-378

609 Ocean Drive, #4-H
Key Biscayne, FL 33149
May 6, 1993



Mr. Donald H. Sweep
District Manager
Bureau of Land Management
411 Briarwood Drive, Suite 404
Jackson, Mississippi 39206

Dear Mr. Sweep:

SUBJECT: WELL DRILLING PERMIT
MICCOSUKEE INDIAN RESERVATION
BROWARD COUNTY, FL

I have previously written to your office and followed with considerable interest, Shell's request of a permit for the above referenced matter.

The draft environmental impact statement, prepared by the respected firm, Dames and Moore Consulting Co., concludes that proposed exploratory well would not have significant impacts on air, vegetation, water, wetlands or wildlife. The recommended mitigation, to the short-term disturbances, is a reasonable solution. Most importantly, water resources and wildlife are unaffected by the proposed drilling.

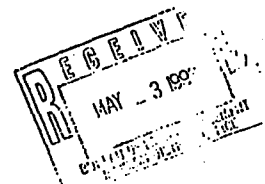
Please consider this letter as my endorsement and support to the conclusion of the draft environmental impact statement and my continuing support of the project and improvement of our domestic oil resources.

Very truly yours,

Sten J. Tonnessen

Sten J. Tonnessen

I-379



Jackson District Office
Bureau of Land Management
411 Briarwood Drive
Suite 404
Jackson, Miss. 39206

To whom it may concern:

It has come to my attention that Shell would like to start oil drilling in the Everglades, and that this issue must be voted on. I urge you to vote against the oil drilling. Not just for the preservation of the Everglades, but for the water that it supplies South Florida.

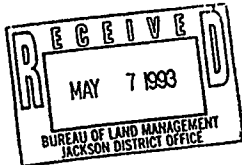
I live in Unincorporated Fort Lauderdale. This is only 10 miles west from the future drilling site. I also do not have city water, I have well water. This water comes from a water supply under the ground. My fear with the drilling is that it will contaminate my water supply.

As a concerned citizen, I ask of you, please when it comes time to vote; vote against the drilling. If not just for the beauty of the Everglades, for the people that benefits from her water supply.

Respectfully yours,

The Torrent Family

I-380



May 3, 1993

Jackson District Office
Bureau of Land Management
411 Briarwood Drive
Suite 404
Jackson, Mississippi 39206

Re: Drilling in the Everglades
by Shell Oil

Dear Sir or Madam:

I had to sit down and relax before writing this letter, as I was scathing mad after reading in the Sun Sentinel Newspaper the article discussing the possibility of your drilling the Everglades for Oil. It is unbelievable that someone could possibly drill for oil in the most precious natural preservation area in South Florida. There are thousands of creatures living in the Everglades that could be affected. GOD forbid that there is a spill or leak, what will happen to the turtles, alligators, fish, and all the bird species that live near the water? What will happen if there is a leak, and the drinking water for South Florida gets contaminated? Does that mean that all of us down here are going to have to start buying bottled water? I think maybe I should call my broker and have him start buying stock in bottled water.

I did not attend the meeting at the county convention center on Thursday, April 15, but I was shocked when I read what happened in the newspaper. I am going to do everything in my power to convince EVERYONE I KNOW that goes to a Shell gas station to never ever buy gas from Shell again, and believe me, I know alot of people, as I have spent half of my working days working for powerful attorneys and spending alot of time on the phone. From now on, when I speak to someone on the phone, this matter will be discussed.

I-381

I am very very disappointed in Shell and in the Indians. I know the Indians are doing this so they can make money to improve their way of life, improve their education and health care, but what about the animals? Don't they have a say in this matter? What will happen to them if there is a leak? Do we the people of South Florida not care enough about these innocent creatures to just step aside and let Shell come in here and start drilling? Where will these animals go if their home is destroyed? It's not like they can just get out of the water and find a new home!!

I hope to GOD that this never happens. If there is ever a leak, it could destroy the Everglades and destroy homes for thousands and thousands and thousands of wonderful, beautiful and precious creatures. I hope that Mr. Robert Abbey of the Bureau of Land Management will make the right decision and say no to this terrible plan of Shell's.

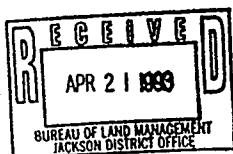
First there was the Valdez accident by Exxon, and we all saw what happened when Exxon fucked up. Do we have to sit around and wait for every oil and gasoline company to have a major catastrophe that affects our most precious wildlife before someone powerful enough to say we must stop this does something? Even though there were hundreds of people at this meeting at the convention center, is it really going to do any good or was it just a waste of everyone's time to go, because the people in charge of everything are just going to go ahead and drill anyway?

I HOPE TO GOD WITH EVERY OUNCE IN MY BODY THAT THIS NEVER EVER HAPPENS. AND IF IT DOES, YOU AND EVERY OTHER SINGLE PERSON WHO WAS INVOLVED IN THIS TERRIBLE EVENT, WILL HAVE TO LIVE WITH THE KNOWLEDGE THAT YOU SCREWED UP BIG TIME IF THERE IS EVER A LEAK.

A WILDLIFE LOVER IN FLORIDA

Turtle

I-382



April 16, 1993

Jackson District Office
Bureau of Land Management
411 Briarwood Drive
Suite 404
Jackson, Mississippi 39206

Re: Drilling in the Everglades
by Shell Oil

Dear Sir or Madam:

I had to sit down and relax before writing this letter, as I was scathing mad after reading in the Sun Sentinel Newspaper the article discussing the possibility of your drilling the Everglades for Oil. It is unbelievable that someone could possibly drill for oil in the most precious natural preservation area in South Florida. There are thousands of creatures living in the Everglades that could be affected. GOD forbid that there is a spill or leak, what will happen to the turtles, alligators, fish, and all the bird species that live near the water? What will happen if there is a leak, and the drinking water for South Florida gets contaminated? Does that mean that all of us down here are going to have to start buying bottled water? I think maybe I should call my broker and have him start buying stock in bottled water.

I did not attend the meeting at the county convention center on Thursday, April 15, but I was shocked when I read what happened in the newspaper. I am going to do everything in my power to convince EVERYONE I KNOW that goes to a Shell gas station to never ever buy gas from Shell again, and believe me, I know alot of people, as I have spent half of my working days working for powerful attorneys and spending alot of time on the phone. From now on, when I speak to someone on the phone, this matter will be discussed.

I-383

I am very very disappointed in Shell and in the Indians. I know they are doing this so they can make money to improve their way of life, via education and health care, but what about the animals? Don't they have a say in this matter? What will happen to them if there is a leak? Do we the people of South Florida not care enough about these innocent creatures to just step aside and let Shell come in here and start drilling? Where will these animals go if their home is destroyed? It's not like they can just get out of the water and find a new home?

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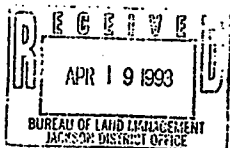
I HOPE TO GOD WITH EVERY OUNCE IN MY BODY THAT THIS NEVER EVER HAPPENS. AND IF IT DOES, YOU AND EVERY OTHER SINGLE PERSON WHO WAS INVOLVED IN THIS TERRIBLE EVENT, WILL HAVE TO LIVE WITH THE KNOWLEDGE THAT YOU SCREWED UP BIG TIME IF THERE IS EVER A LEAK.

A WILDLIFE LOVER IN FLORIDA

Lisa "Turtle"

Turtle has been my nickname for the past three years.

I-384



4/16/93

How could anyone even consider letting an oil company drill in or around the Everglades?

Besides the obvious potential damage to the environment + the ecosystem (which has taken enough abuse from the government and agricultural interests, such as "Sugar") - this is our only source of drinking water for millions of people.

The only motivation the Indian Shell Oil have is money. The interests of the people should come first.

Just Say NO

Ked Little 3232 Beechberry Cir.
DAWIE, FL 33328

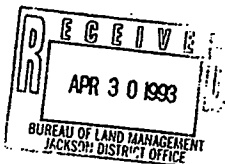
I-385

Annette Ungerman
1201 S. Hillcrest Court, #312
Hollywood, Florida 33021

Mr. Tully,

I urge you to turn down Shell oil's application for a permit to drill for oil in the Everglades. It is so important not to do anything to upset the delicate balance there.

Sincerely,
Annette Ungerman



I-386

2828 NE 30th St.
Lighthouse Point, FL 33064
May 14, 1993

Jackson District Office
Bureau of Land Management
411 Briarwood Dr., #404
Jackson, MS 39206

Gentlemen:

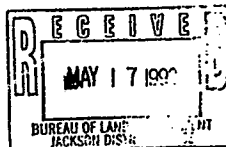
This letter is being written as a plea to "Save the Everglades."

Therefore, I am requesting that you not allow oil to be drilled in the area. Although I feel that a balance needs to be struck between commercial and environmental issues, I think that the harm which would be done by drilling in the Everglades would far surpass any good.

I trust that this matter is being considered very carefully and that you will decide that what remains of the Everglades should not be destroyed.

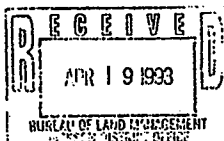
Very truly yours,

Maggie Vail



I-387

I-388



DON'T LET SHELL OIL DRILL!

April 19, 1993

Mr. Robert Abbey
Jackson District Office
U. S. Bureau of Land Management
411 Briarwood Drive
Suite 404
Jackson, MS 39206

Gentlemen:

Native Americans have a saying that they are the "caretakers" of Mother Earth and their philosophy is that it is mankind's responsibility to take care of the earth and her creatures for the next seven (7) generations.

It should be the Land Management's responsibility to protect the Everglades for generations yet unborn. If the Everglades was a patient, doctors would say it is already in critical condition. There is a delicate balance in the environment of the Everglades and MAN'S callousness, ignorance, greed and abuse are guaranteed to tip the scales. **WHAT WILL SHELL OIL DO WHEN THEY ARE SITTING ON TOP OF A DEAD PLANET?**

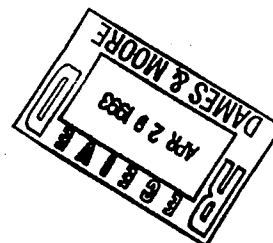
Men come and go. Mother Nature survives. Leave the Everglades alone, Mother Nature knows what she's doing.

Sincerely,

Kathleen Valentine
Kathleen Valentine
333 Sunset Dr., Apt 305
Fort Lauderdale, Florida 33301

4/15/93

*Save the Everglades -
Haven't we learned a lesson
on Oil Companies w/ oil
spills - yes it can happen
here nothing is fool proof
thru the too little pen Valerine
Coral Springs FL 33065*



I-389

I-390

Christian Van Den Heuvel
1617 Northeast 4th Place
Fort Lauderdale, Florida 33301
(305) 760-7553

Jackson District Office
Bureau of Land Management
411 Briarwood Drive, Suit 404
Jackson, Mississippi 39206

To whom it may concern:

I am 31 years of age, and have lived in South Florida for 28 years. During this time there has been massive exploitation of our very sensitive Ecosystem. Developers have drained the wet lands where many endangered species breed, sugar mills have polluted Lake Okachobee to a point where there lies a danger in eating any fish caught from its waters. Sewage treatment plants keep dumping raw sewage into our Intercoastal waterways, so often that there lies a danger in just swimming in the water. Mercury levels are above safe levels in almost all inland lakes (I don't know where this comes from). Oil and gas spills occur in Port Everglade at least once or twice a year. Commercial fishermen take so many fish from our waters I've given up the sport.

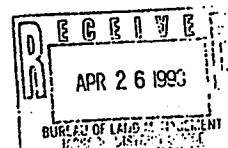
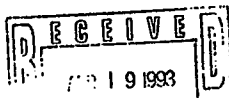
Now we plan on allowing Shell Oil to drill in the Everglades. If we have a spill in the aquifer there goes the Everglades and our drinking water. Who is making these decisions? I didn't vote on this! When are we going to put life in front of MONEY? WERE DO WE DRAW THE LINE?

I am shocked that I have to write to Jackson Mississippi about this problem. You don't live here. You don't see the destruction.

I am Highly opposed to ANY drilling in the Everglades.

With Great Concern:

Christian Van Den Heuvel, Jr.
Christian Van Den Heuvel, Jr.
Mechanical Engineer



Jackson District Office
Bureau of Land Management
411 Briarwood Drive
Suite 404
Jackson, Mississippi 39206

To whom it may concern:

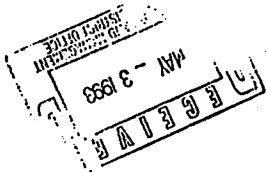
As a south Floridian who values the environmentally sensitive Everglades, I am adamantly opposed to Shell Oil's plans to drill for petroleum there. No number of precautions can assure that contamination will not eventually occur, due either to a natural or human-induced disaster. I urge you to make all efforts to thwart Shell's plans to exploit the Everglades. . . before it is too late for our wildlife, our economy, our water supply, and the preservation of the unique and natural beauty of the Everglades.

Very Concerned,

Raoul F. Van Ligt
RAOUL F VAN LIGTEN
5420 NW 86TH TER
CORAL SPRINGS, FL 33067

I-391

Jackson District Office
Bureau of Land Management
411 Briarwood Drive
Suite 404
Jackson, Miss. 39206



To whom it may concern:

It has come to my attention that Shell would like to start oil drilling in the Everglades, and that this issue must be voted on. I urge you to vote against the oil drilling. Not just for the preservation of the Everglades, but for the water that it supplies South Florida.

I live in Unincorporated Fort Lauderdale. This is only 10 miles west from the future drilling site. I also do not have city water, I have well water. This water comes from a water supply under the ground. My fear with the drilling is that it will contaminate my water supply.

As a concerned citizen, I ask of you, please when it comes time to vote; vote against the drilling. If not just for the beauty of the Everglades, for the people that benefits from her water supply.

Respectfully yours,

The Varga Family

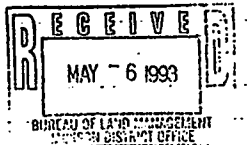
I-392

To whom it may concern

I wish to express my concern regarding drilling in the F.A. Everglades. The Environmental impact on our wetlands, which is already threatened will greatly increase. Please review my decision not for monetary value but for the beauty and prestige the wildlife holds for future generations to come.

Thank you

Ralph Ventimoghe



I-393

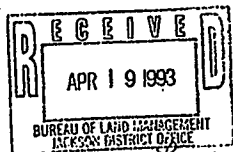
I-394

Copy to [unclear]

April 15 1993

Cecile R. Vogel, A&I.D.

7129 Promenade Drive
Boca Raton, FL 33433
(407) 368-0777



Dear Mr. Abbey
I really don't know how you could get a consensus of the people view of upholding the Everglades for the wealth of our Co. Besides we are a Boycott of shell then and only then can the people speak. I call a Boycott from April 18 to May 18 (your deadline) then we will see and so will shell.

Yours Truly
Cecile R. Vogel

Ann C. Vandenbergh

Let Shell drill in Hell

By

ADRIAN AUMEN

Talk about outrageous.

With all the predictions about how much it's going to cost us to clean up the Everglades and the water wars that could divide South Florida, Shell Oil Company still wants to drill in the middle of the Everglades.

The very idea of poking more holes in the already ailing system and increasing risks to wildlife and water supplies is nothing short of arrogant.

So is Shell's attempt to "greenwash" the plan by presenting an Environmental Impact Statement that uses outdated maps and information. It only skims the surface of issues such as the effects on groundwater and future restoration plans.

The proposed drill site is at the edge of the Big Cypress National Preserve (located by the Collier/Broward line, north of Alligator Alley) and the world-renowned sawgrass marsh, a conservation area that keeps Broward and Dade counties from running out of water.

State rules prohibit direct drilling in the conservation area, so Shell came up with a way around it - by drilling at an angle. The drilling rig would be outside the conservation area, on land owned by the Miccosukee Indians (read: federal land). The end of the drill would be 4,700 feet east - smack dab in the conservation area, at 18,850 feet down.

Slick.

The drilling rig would stand in a cattle pasture within 200 feet of a canal and only 1,000 feet from a pumping station that funnels water into the Everglades water catchment areas. Imagine what a hurricane could do with that setup. The area is also home to Florida

panthers, wood storks, Everglades kites, Everglades minks and, in the Shell study's own incriminating words, "other waterfowl" (sic).

Shell's tenacity would make you think it expects to find a pool of oil the size of Prince William Sound, but even the experts doubt there's much to be found. There's not much oil in Florida, and the oil that's here is of such poor quality that it's hardly worth refining.

Could it be worth losing the Everglades? Shell admits that, if it finds oil, it's likely to seek more drilling. It also admits that spills are inevitable.

Exxon and other firms drilling nearby have been unable to prevent spills. Almost 163,000 gallons of crude oil and 120,000 gallons of plant-killing brine already have been spilled in the Everglades area. Unchecked, one gallon of petroleum can contaminate one million gallons of drinking water.

That's why about 300 South Floridians, and even some tourists, crammed a recent public hearing in Broward County to talk with Washington bureaucrats on the issue.

"Tell Shell to drill in Hell!" yelled some folks. Others are cutting up their Shell credit cards and taking their business elsewhere. Not a bad idea.

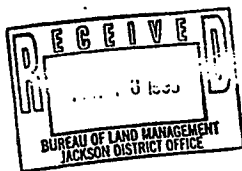
What you can do Unless something changes, the U.S. Department of the Interior is expected to approve Shell's plans soon. Besides cutting up your Shell card and boycotting the stations, here's some folks you can write. Or just mail them this column.

Bruce Babbitt
Secretary of the Interior
1849 C Street, NW
Washington, D.C. 20240
(202) 208-7150

Carol Browner
U.S. Environmental Protection Agency
401 M Street, SW
Washington, D.C. 20460
(202) 260-4700

Robert V. Abbey
District manager of the Bureau of Land Management
Jackson District Office
411 Briarwood Drive,
Suite 404
Jackson, MS 39203

I-395



Dear District Manager:

I am a concerned South Florida resident asking you to please stop Shell Oil Co. from exploratory drilling in the eastern Everglades.

May I remind you that this is a CONSERVATION area, where our fragile environment is supposed to be PROTECTED, not threatened by a company whose only purpose is to make a profit at the expense of our main source of fresh water.

I am vehemently opposed to this drilling, and will do everything in my power to see that it is stopped.

Thank you for your time.

Michael Walder
Michael Walder

I-396

May 16, 1993

Jackson District Office,
Bureau of Land Management,
411 Briarwood Drive,
Suite 404,
Jackson, MS 39206

Re: Oil Drilling in the Florida Everglades

Gentlemen:

It is our decided opinion that NO SUCH activity take place - now or in the foreseeable future!

Trusting you understand just what it is we intend to convey, we remain,

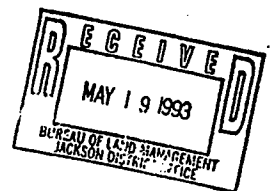
Respectfully,

Donald E. Walls
Donald E. Walls

Emily B. Walls
Emily B. Walls
4052 S. W. 3rd. St.,
Plantation, FL 33317

Copies to:
United States Legislators
Senator Connie Mack
Senator Bob Graham
Representative Peter Deutsch

Florida Governor & Cabinet
Lawton Chiles, Governor
Jim Smith, Secretary of State
Tom Gallagher, Treasurer
Bob Crawford, Commissioner of Agriculture



I-397

Ms. Diana D. Ward, R. N.
2401 - 41st Street North
St. Petersburg, FL 33713
May 31, 1993

Mr. Robert V. Abbey, District Manager
Bureau of Land Management
411 Briarwood Drive, Suite 404
Jackson, MS 39206

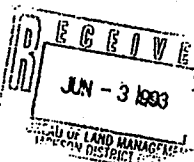
Dear Mr. Abbey:

I understand that from now until November you will be deciding whether or not to issue Shell Oil a permit to drill an exploratory well in the Florida everglades. Even though the area is not within Everglades National Park, it is still in the "historic" everglades.

Please deny the permit.

Respectfully,

Diana D. Ward
Diana D. Ward



I-398

April 16, 1993

Jackson District Office
Bureau of Land Management
411 Briarwood Drive
Suite 404
Jackson, Mississippi 39206

To Whom It May Concern:

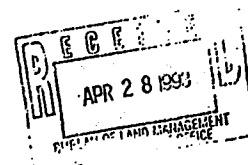
We are writing to protest the plans of Shell Oil Company to drill for oil in the Florida Everglades. As Shell customers, we are outraged that there is even any question of drilling in one of Florida's most important natural resources.

Florida has taken great pains to ensure that wildlife in the Everglades is protected, including some species which are endangered. The State has allowed certain acceptable periods for the hunting of specific species. Allowing Shell Oil Company to drill for oil is the same as giving them carte blanche to hunt and eventually destroy all wildlife in the area.

In the event the plans to drill proceed, we will boycott all Shell Company Products. As Floridians, we are overrun with the damage caused by Hurricane Andrew, sprawling cities, and millions of tourists, let us keep the only natural resource we have left, the Everglades.

Respectfully,

Mr. and Mrs. Brian Waterman
Mr. and Mrs. Brian Waterman



I-399

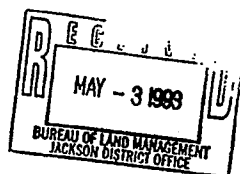
April 28, 1993

Dear Mr. Abbey,

I am concerned about the drilling proposal in the everglades. This area is the last ecosystem of it's type in the world. The protective measures to be used are not enough and this has been proven several times already. The damage to the everglades should such a spill occur would be devastating to an already fragile system. The report concerning the drilling was inadequate and dodged the issues. Shell oil should seek alternative sources of energy and instead of raping the environment save it. There are patents for environmentally sound devices, but the oil companies have bought these patents and shelved them. I, and the people I spoke with, will not stand for this. If Shell cannot use alternate, environmentally sound sources of energy then I do not see a future for them in our world.

Sincerely,

Troy Webster
Troy Webster



I-400

MAY 5 1993

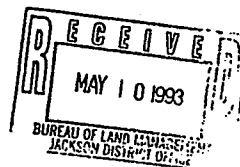
Gentlemen -

I am writing to support the findings of the DEIS regarding a proposal by Shell Oil Co. to drill a well in South Florida on the Miccosukee Indian Reservation in western Broward County.

THANKS

WALTER WEERS

2226 Sunitzer Land #6
Clearwater FLA 34623



I-401

Honorable Sir: April 27, 1993

The Everglades are a vital area and should be restored and preserved. Shell Oil is using outdated maps to support its bid. Disaster will occur. Please help preserve the Everglades. Thank you

Very truly yours,
Sylvia Weers

26
85

I-402

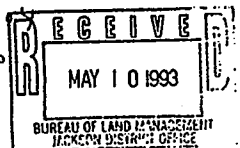
S. Weinberg
1201 S. Hillcrest Ct
Hollywood FL 33021

Mr. Robert Abbey
District Manager
Bureau of Land Management
411 Briarwood Drive Suite 4
Jackson, Mississippi 39206

Dear Sir:

I urgently request that you deny Shell Oil Co. a permit to drill for oil in the Everglades. This is a unique ecosystem in severe distress and needs restoration - not further desecration.

Sincerely,
Sylvia Weinberg



I-403

MAY 2, 1993

TO WHOM IT MAY CONCERN:

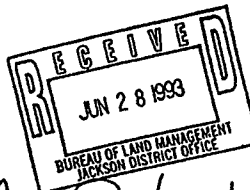
I AM WRITING TO YOU IN PROTEST REGARDING YOUR INTENT TO ALLOW THE SHELL OIL CO. TO DRILL FOR OIL IN OUR EXTREMELY STRESSED, ECO-SENSITIVE, GLORIOUS EVERGLADES. IS THERE NO END TO YOUR MADNESS? WHAT G-D HAS WROUGHT, ONLY YOU CAN WRENCH ASUNDER.

MY FAMILY AND I IMPORE YOU TO REFUSE SUCH AN INSANE, ARROGANT PLAN AND ALLOW THE EVERGLADES TO BE PRESERVED FOR US AND OUR CHILDREN AND OUR CHILDREN'S CHILDREN.

RESPECTFULLY YOURS,

Malene Weiss

I-404



ARNIE WELBER
3026 ALHAMBRA ST. APT. 21
FT. LAUD., FL 33304-4331 U.S.A.

JUN 24, 93

Mr. Robert V. Abby
District Manager
Bureau of Land Management
411 Briarwood Drive, Suite 404
Jackson, MS 39206

Mr. Abby,
On Thursday, May 13th
state water managers in West Palm
Beach passed a resolution soundly
condemning and opposing oil well
project. They are not alone!

I-405

Mrs. GINIA DAVIS WEXLER
3880 GALT OCEAN DRIVE APT. 1211
FT. LAUDERDALE, FL 33308

April 17, 1993

Jackson District Office
Bureau of Land Management
411 Briarwood Drive, Suite 404
Jackson, MISS 39206

Sirs:

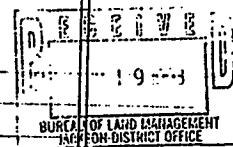
I write to oppose any
drilling for oil, exploratory or otherwise
in our precious Everglades National Park.

How such a project could even be
considered is inconceivable. The Everglades
Park is already so frail due to man's
mismanagement. And now you would
sanction the final insult to this fragile
eco system.

Please, hands off the
Everglades. Sincerely,

Mrs. Ginia Davis Wexler

I-406



707 NE 20 AV
FORT LAUDERDALE
FL 33304

JACKSON DISTRICT OFFICE
BUREAU OF LAND MANAGEMENT
411 BRIARWOOD DR.
SUITE 404
JACKSON, MISS. 39206

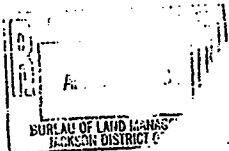
The day paid your salary → 4-15-93

DEAR MR. ABBEY,

**NO OIL DRILLING IN
EVERGLADES !
EVER.**

Stephen Whitney
STEPHEN WHITNEY

I-407



To: Robert V. Abbey
Re: Drilling in everglades

4/20/93

The issue of drilling for oil in the everglades is one that concerns me. I feel that we should do whatever we can to preserve the small amount of land that is left uninhibited by people. Is it true that the area for the well site is right in the middle of a panther crossing path? I am very concerned about the well being of the animals & the safety... what about the transportation of oil from the well site? What about the possibility of an oil spill. It seems to me that there must be a better way ~~to~~ a better, more suitable place to get oil.

87

21

72

Sincerely,
Michelle Whitt

I-408

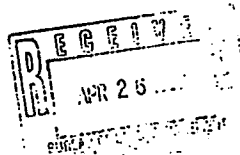
Jackson District Office
Bureau of Land Management
411 Briarwood Drive
Suite 404
Jackson, Mississippi 39206

To whom it may concern:

As a south Floridian who values the environmentally sensitive Everglades, I am adamantly opposed to Shell Oil's plans to drill for petroleum there. No number of precautions can assure that contamination will not eventually occur, due either to a natural or human-induced disaster. I urge you to make all efforts to thwart Shell's plans to exploit the Everglades... before it is too late for our wildlife, our economy, our water supply, and the preservation of the unique and natural beauty of the Everglades.

Very Concerned,

(Daryl Wilcox)



I-409

25188 Marion Avenue
Villa 14
Punta Gorda, Florida 33950

May 11, 1993

Robert V. Abbey
District Manager
Bureau of Land Management
411 Briarwood Drive suite 404
Jackson, Mississippi 39206

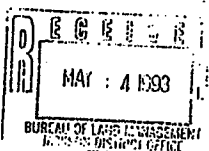
Dear Mr. Abbey:

We just heard that Shell Oil has applied for a permit to drill for oil in the Florida Everglades. We hope that such permission does not come to pass.

Florida's unique ecosystem has already sustained considerable damage through improper agricultural, ranching practices, etc., and the Everglades should not be further damaged by drilling for oil.

We urge your denial of this application.

Sincerely,
Paul A. Willey
Marie S. Willey
Marie S. Willey



I-410

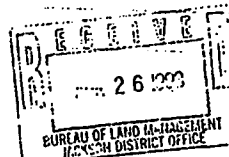
April 21, 1993

Dear Sir:

I am very much concerned about Shell Oil drilling for oil in the Everglades. This is in the crossing path of panthers. Also, pollution of ground waters in the Biscayne Aquifer. Are there other alternatives to drilling? How will you (Shell Oil) move the oil? What guarantee do we have against a spill?

I really feel there should be further studies before a decision is made.

Thank you for your time and patience that you have given me in order to hear my concerns of this important matter.



I-411

I-412

May 7, 1993

Mr. Bob Abbey
Bureau of Land Management
411 Briarwood Drive
Suite 404
Jackson, Mississippi 39206

SUBJECT: Shell Oil Company/Miccosukee Indian Reservation
Exploratory Drilling

Dear Mr. Abbey:

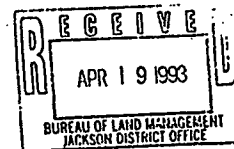
I contacted your office recently and they informed me the best way to be heard on the above matter is to write you directly. I attended the recent public hearing in Ft. Lauderdale and of course heard a very organized effort to prevent any type of drilling in our Everglades.

I just want to go on record in favor of exploratory drilling since I strongly feel it is important to know where our "domestic" reserves are in case they are needed. The environmental impact statement prepared independently of both the government and Shell Oil Company seems to show very minimal adverse impact if this drilling were approved and the benefits seem to far outweigh the negatives. I would like to go one step further and support every effort to market the crude oil if found since it will provide jobs in the private sector and income to every level of government. It would also reduce our dependence of foreign oil, something I feel is critical to do in the years to come.

Once again, I salute your willingness and desire to "hear" all sides of the issue and as a long time resident of S.E. Florida, I can only wish we can get on with the job at hand and see if there are any reserves out there.

Sincerely yours;

Mark G. Winder
Mark G. Winder
2315 N.W. 27th St.
Lighthouse Point, Florida
33064
(305) 943-4827



Mrs. Amy M. Windhorst
5131 N.E. 19th Terrace
Pompano Beach, FL 33064

April 15, 1993

Jackson District Office
Bureau of Land Management
411 Briarwood Drive, Suite 404
Jackson, Mississippi 39206

Re: Experimental Everglades Oil Drilling By Shell Oil Or Any Other Oil Company

Dear Sir/Madame:

One doesn't have to be Magna Cum Laude to understand that oil drilling and sensitive conservation areas **DO NOT MIX**.

I understand that the oil companies have more money than God and, therefore, wield the power to do whatever it is that they please to amass yet more wealth to control yet more politicians regardless of the cost of the environment and the creatures so precariously balanced on it.

What ever happened to solar power research? What ever happened to research in the areas of electric vehicles? What ever happened to research to improve mass transit? Whatever happened to all of the tax-payer money spent on all of these import areas? I bet I can guess.

For the record, I am totally opposed to any and all oil drilling in this or any other conservation area in addition to any other potential hazardous practices the Bureau of Land Management and it's Corporate partners in crime are sure to dream up next. As a registered voter in Broward County Florida I could not support any candidate condoning this or any similar actions.

I would also like to state that a reply to this letter is expected, however, I'm not as ignorant as to hold my breath waiting for one.

Sincerely,

Amy Windhorst
Mrs. Amy Windhorst

cc: Governor Chiles
Bob Graham
E. Clay Shaw
John Rayson
Sun-Sentinel, XS Magazine

I-413

I-414

May 7, 1993

Robert Abbey
Jackson District Office
Bureau of Land Management
411 Briarwood Drive, Suite 404
Jackson, Miss. 39206

Dear Mr. Abbey,

I understand you are the one who will make the final decision as to whether or not Shell Oil will be permitted to drill for petroleum in the Everglades.

I sincerely hope you will not permit this to happen. Hasn't man already done enough to damage the Everglades? I would say yes. And it is time to put a stop to it.

The Palm Beach Post did a special report on the Everglades who is critical.

Please take time to read it.
It is very interesting and informative. Please note what it is going to cost to repair the damage to this unique area of South Florida. There isn't any place else like it in the whole world.

Surely there must be somewhere else that Shell can look for petroleum. Hopefully one of these days soon there will be an affordable, battery operated car and then there will not be the great need for petroleum.

Oil reserves are not needed in Florida.

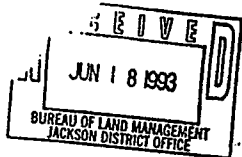
Please turn it down.

I thank you for taking the time to read my note. Hopefully the special report by the Palm Beach Post.

Sincerely,

James Winder
P.O. Box 16268, Plantation, FL 33318-6268

I-415



Robert V. Abbey, District Manager
Bureau of Land Management
411 Briarwood Drive, Suite 404
Jackson, MS 39206

Dear Mr. Abbey:

I understand that from now until November you will be deciding whether or not to issue Shell Oil a permit to drill an exploratory well in the Florida Everglades. Even though the area is not within Everglades National Park, it is still in the "historic" Everglades. Please deny the permit.

Very sincerely,

Alicia Witt

Alicia Witt
17 Weebetook Ln.
Cincinnati, Ohio 45208

I-416

LEAGUE OF
WOMEN VOTERS
OF FLORIDA

540 Beverly Court, Tallahassee, FL 32301 Telephone (904) 224-2545

Kay Allen, President

CALL TO ACTION

Shell Oil Company has applied for a permit to drill for oil in the Everglades. The League of Women Voters of Florida joins many other organizations which are environmental advocates to challenge this request.

Please write as individuals (in your own name) to the following to indicate you would like this permit application denied:

Mr. Robert V. Abbey*
District Manager
Bureau of Land Management
411 Briarwood Drive Suite 404
Jackson, Mississippi 39206

The Honorable Peter Deutsch
House of Representatives
Washington, D.C. 20515

The Honorable Bruce Babbitt
Secretary of the Interior
1849 C Street, NW
Washington, D.C. 20240

If you want to do more, you may also want to write:

William Clinton
The President
The White House
1600 Pennsylvania Avenue
Washington, D.C. 20500

Albert Gore
The Vice-President
Executive Office Building
Washington, D.C. 20501

Your note can be brief and postcards are fine. You may want to point out that the Everglades is a unique ecosystem - its health affects the water supply of millions of people, the climate, wildlife and the economic system of South Florida. The Everglades is in severe distress now and needs restoration. Further risk is unwarranted and very poor precedent. Furthermore, the environmental impact statement funded by Shell Oil relies on outdated maps and erroneous conclusions.

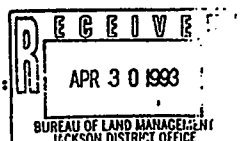
Please spread the word and call me if you have questions - Thanks for all your help.

Stephanie Pearson
752-2713

*He will make decision, please submit comments by May 18, 1993

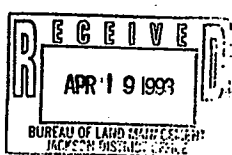
John P. Yonish

Mr. & Mrs. John P. Yonish
13 Almetonka Road
Sea Ranch Lakes
Ft. Lauderdale, FL 33308



We are very much against any drilling in the Everglades
Janice Yonish

I-417



April 15, 1993

8307 N.W. 80th St.
Tamarac, FL 33321

Mr. Robert Abbey
Bureau of Land Management
411 Briarwood Drive
Suite 404
Jackson, Miss. 39206

Dear Mr. Abbey,

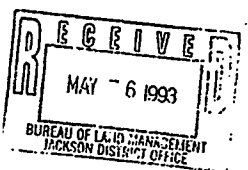
Represent the wishes of the people of Broward county and do not allow Shell Oil Company to drill for oil in the Everglades. Thank you.

Sincerely,

Lee Zauser
Lee Zauser

I-418

DRAFT ENVIRONMENTAL IMPACT STATEMENT
APPLICATION FOR PERMIT TO DRILL
AN EXPLORATORY WELL
ON THE
MICCOSUKEE INDIAN RESERVATION



Written comments on the Draft Environmental Statement are being accepted until May 18, 1993. Comments on the analysis and the preferred alternatives are specifically sought. Please provide your name and address. Comments should be sent to:

District Manager
Bureau of Land Management
411 Briarwood Drive, Suite 404
Jackson, Mississippi 39206

Attention: Robert V. Abbey

COMMENTS:

Before even considering alternatives to drilling for oil on the Miccosukee Indian reservation in the heart of the Everglades, should we not forget the recent past episodes of oil disasters.

We as responsible people would be taking a great risk possibly destroying what is left of the great Everglades, a one of a kind eco-system. This eco-system with its wealth of fresh water is much more important to the people of the state than oil could be, in that the oil monetarily would not directly affect them, but could in fact directly affect them in the face of disaster.

What I am saying is that if there should ever be any kind of oil spill or leak into the Everglades, not only will its delicate nature suffer, but so will the water table on which the people of

I-419

South Florida depend, through contamination.

We must keep this in mind when proposing such major additions to our environment, and must try to consider whatever alternatives are out there. We must not be greedy. We should not take just a little more. We should work on the development of new more efficient resources, instead of being lazy relying on old limited resources like oil and remember what Sir Francis Bacon said, "We cannot command nature except by obeying her". In other words play by nature's rules and we will all benefit. We've seen what oil exploration can do.

Thank you and please consider the long term effects in your decision and choose not to drill for oil in our Everglades.

Thank you

Evan Zekofsky

Evan Zekofsky

-student and South Florida native.

The Everglades should be forever!

Evan Zekofsky

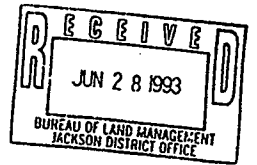
9531 N.W. 24 ST

Surfside, FL 33322

I-420

120 S.W. 96th Terrace, #203
Plantation, Florida 33324
June 22, 1993

Robert Abbey
District Manager
Bureau of Land Management
411 Briarwood Drive
Suite 404
Jackson, Mississippi 39206



Dear Mr. Abbey:

We are writing this letter to protest the Shell Oil Company proposal to drill in the Everglades. The well they are proposing would be located immediately west of the L-28 Canal and Water Conservation Area 3A (WCA-3A). We are aware that the plan contains several measures designed to protect the environment, and the environmental impact statement (EIS) concludes there will be no significant environmental impacts. However, the EIS was prepared by an engineering firm hired by Shell Oil. Even though tribe biologist, Gene Duncan, points out that dozens of wells have already been punched in the Everglades, including wells in the Big Cypress National Preserve, we feel that the same mistakes don't need to be made in the future by punching more wells in the Everglades. We urge your agency to oppose oil drilling in the Everglades. Thank you for your attention.

Sincerely yours,

Ingrida Zebelins
James Kolze
Ingrida Zebelins, Ph.D.
James Kolze

P.S. This letter is in reference to the Draft Environment Impact Statement for Miccosukee 3-1 well.

I-421

MENTAL FLOSS

ECO

AT ST

NO NAME

Let Shell drill in Hell

By

ADRIAN AUMEN

Talk about outrageous.

With all the predictions about how much it's going to cost us to clean up the Everglades and the water wars that could divide South Florida, Shell Oil Company still wants to drill in the middle of the Everglades.

The very idea of poking more holes in the already ailing system and increasing risks to wildlife and water supplies is nothing short of arrogant.

So is Shell's attempt to "greenwash" the plan by presenting an Environmental Impact Statement that uses outdated maps and information. It only skirts the surface of issues such as the effects on groundwater and future restoration plans.

The proposed drill site is at the edge of the Big Cypress National Preserve (located by the Collier/Broward line, north of Alligator Alley) and the world-renowned sawgrass marsh, a conservation area that keeps Broward and Dade counties from running out of water.

State rules prohibit direct drilling in the conservation area, so Shell came up with a way around it - by drilling at an angle. The drilling rig would be outside the conservation area, on land owned by the Miccosukee Indians (read: federal land). The end of the drill would be 4,700 feet east - smack dab in the conservation area, at 18,850 feet down.

Slick.

The drilling rig would stand in a cattle pasture within 200 feet of a canal and only 1,000 feet from a pumping station that funnels water into the Everglades water catchment areas. Imagine what a hurricane could do with that setup.

The area is also home to Florida

panthers, wood storks, Everglades kites, Everglades minks and, in the Shell study's own incriminating words, "other waterfowl" (sic).

Shell's tenacity would make you think it expects to find a pool of oil the size of Prince William Sound, but even the experts doubt there's much to be found. There's not much oil in Florida, and the oil that's here is of such poor quality that it's hardly worth refining.

Could it be worth losing the Everglades?

Shell admits that, if it finds oil, it's likely to seek more drilling. It also admits that spills are inevitable.

Exxon and other firms drilling nearby have been unable to prevent spills. Almost 183,000 gallons of crude oil and 120,000 gallons of plant-killing brine already have been spilled in the Everglades area. Unchecked, one gallon of petroleum can contaminate one million gallons of drinking water.

That's why about 300 South Floridians, and even some tourists, crammed a recent public hearing in Broward County to talk with Washington bureaucrats on the issue.

"Tell Shell to drill in Hell!" yelled some folks. Others are cutting up their Shell credit cards and taking their business elsewhere.

Not a bad idea.

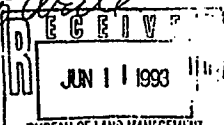
What you can do
Unless something changes, the U.S. Department of the Interior is expected to approve Shell's plans soon. Besides cutting up your Shell card and boycotting the stations, here's some folks you can write. Or just mail them this column.

Bruce Rabbitt
Secretary of the Interior
1849 C Street, NW
Washington, D.C. 20240
(202) 206-7150

Carol Browner
U.S. Environmental Protection Agency
401 M Street, SW
Washington, D.C. 20460
(202) 260-4700

Robert V. Abbey
District Manager of the Bureau of Land Management
Jackson District Office
411 Briarwood Drive
Suite 404
Jackson, MS 39206

why, why, why other than the almighty \$, this makes absolutely no sense to drill



I-422

NO NAME

① We don't want Shell oil to drill in the or near The Everglades.
② We also don't want a Rail System from The Airport to Miami Beach. I don't want to see the Gov. Should not listen to politicians listen to the people.

I-423

Dear District Manager:

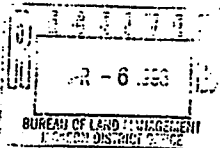
I am a concerned South Florida resident asking you to please stop Shell Oil Co. from exploratory drilling in the eastern Everglades.

May I remind you that this is a CONSERVATION area, where our fragile environment is supposed to be PROTECTED, not threatened by a company whose only purpose is to make a profit at the expense of our main source of fresh water.

I am vehemently opposed to this drilling, and will do everything in my power to see that it is stopped.

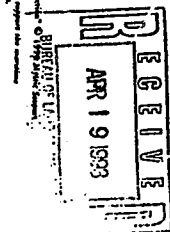
Thank you for your time.

James L. [Signature]



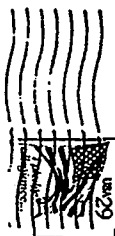
I-424

MOORE AT BAYTER STATE PARK
Mc. Kinsley, Miss.



PLEASE
DONT
DRILL !!

TO:
JACKSON DIST OFFICE
BUREAU OF LAND MGMT
411 BRIARWOOD DR.
SUITE 404
JACKSON, MS. 39206



I-425

Jackson District Office
Bureau of Land Management
411 Briarwood Drive
Suite 404
Jackson, Mississippi 39206

To whom it may concern:

As a south Floridian who values the environmentally sensitive Everglades, I am adamantly opposed to Shell Oil's plans to drill for petroleum there. No number of precautions can assure that contamination will not eventually occur, due either to a natural or human-induced disaster. I urge you to make all efforts to thwart Shell's plans to exploit the Everglades. . . before it is too late for our wildlife, our economy, our water supply, and the preservation of the unique and natural beauty of the Everglades.

Very Concerned,

William A. Daniel Smith

I-426

Jackson District Office
Bureau of Land Management
411 Briarwood Drive
Suite 404
Jackson, Mississippi 39206

To whom it may concern:

As a south Floridian who values the environmentally sensitive Everglades, I am adamantly opposed to Shell Oil's plans to drill for petroleum there. No number of precautions can assure that contamination will not eventually occur, due either to a natural or human-induced disaster. I urge you to make all efforts to thwart Shell's plans to exploit the Everglades. . . before it is too late for our wildlife, our economy, our water supply, and the preservation of the unique and natural beauty of the Everglades.

Very Concerned,

William A. Daniel Smith

I-427

Jackson District Office
Bureau of Land Management
411 Briarwood Drive
Suite 404
Jackson, Mississippi 39206

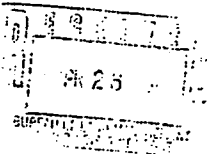
To whom it may concern:

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Very Concerned,

P. J. [Signature]

5



I-428

Jackson District Office
Bureau of Land Management
411 Briarwood Drive
Suite 404
Jackson, Mississippi 39206

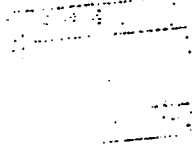
To whom it may concern:

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Very Concerned,

[Signature]

6



I-429

Jackson District Office
Bureau of Land Management
411 Briarwood Drive
Suite 404
Jackson, Mississippi 39206

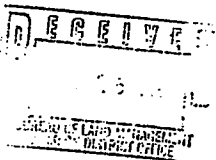
To whom it may concern:

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Very Concerned,

[Signature]

7



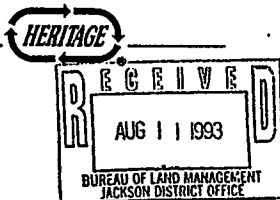
B-1

HERITAGE REMEDIATION/ENGINEERING, INC.

P.O. Box 51020
Indianapolis, IN 46251
Phone: 317/243-7475
FAX: 317/243-2046

Mr. Robert V. Abbey
District Manager
Bureau of Land Management
411 Briarwood Drive, Suite 404
Jackson, MS 39206

August 9, 1993



Re: Draft Environmental Impact Statement (DEIS)
Miccosukee 3-1 Well

Dear Mr. Abbey:

Heritage Remediation/Engineering, Inc. (HRE) has prepared the following comments regarding the Draft Environmental Impact Statement (DEIS) for the Shell Western E&P Inc. (SWEPI) Miccosukee 3-1 exploratory well in Broward County, Florida, dated March 8th, 1993.

HRE is an environmental consulting and remediation firm with headquarters in Indianapolis, Indiana. HRE has experience with investigation of numerous types of environmental projects. Specifically, HRE recently conducted investigations and reviewed procedures oil production activities in south Florida including the Big Cypress National Preserve.

HRE's comments specifically address the protection of ground and surface waters as described in the DEIS. In general, HRE believes that the level of effort undertaken to protect surface and ground waters, if properly constructed and implemented, are adequate for the intended purpose. The engineering controls, including diking, lined drill rig containment area with construction quality assurance (CQA) for liners, and surface and ground water monitoring should ensure safe and effective controls during drilling activities. The water supply wells drilled should be constructed to guard against cross-connection of subsurface formations and appropriate consideration should be given to ensure that the wellhead areas are sealed and protected from these wells potentially becoming a conduit for downward migration into subsurface formations. All monitoring or water supply wells should be grouted upon completion of the intended use.

The permit approval process from south Florida regulatory agencies for oil and gas operations and full compliance with the recently revised Florida Department of Environmental Protection (formerly the FDER/FDNR) rules (Chapters 16C through 30) for oil and gas operations should be strictly followed. Compliance with Florida oil and gas rules provides further assurance for protection of surface and ground water resources.

HRE believes that the DEIS reflects consideration of state of the art practices for oil well drilling in south Florida. If properly implemented, the activities associated with the drilling of the Miccosukee 3-1 exploratory well could be expected to have minimal impacts on surface and ground waters.

If you should have any questions regarding HRE's comments, please contact me at (317) 243-7475. HRE appreciates the opportunity to provide comments on the DEIS.

Sincerely,

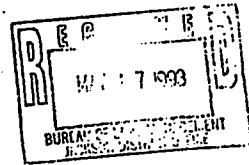
HERITAGE REMEDIATION/ENGINEERING, INC.

ROM
Douglas A. Opell, CPG
Senior Project Geologist

DAO/bjm

3-8-9303
D003323A

B-2



Dear Mr. Abbey:

I am writing to express my deep concern and abhorrence to possible drilling in search of oil in our Everglades.

I strongly recommend reviewing Shell Oil's motive, promises and the consequence of an exploratory well being so near the Biscayne Aquifer. (Please review the problems and deficiency of Big Cypress Swamp.)

The ancient marshland is a key link in our water supply, moderates our climate and attracts one million-plus tourists to our area. It has been decreed a place of safety for wildlife and a zone of our planet where life naturally occurs - set apart from development. Such an area is vital and not an appropriate place for industrial activity.

Rest assured I will do all I can to stop any drilling and will encourage all Floridians and Americans to speak out - write out and vote out against this!

Sincerely,

8

B-3

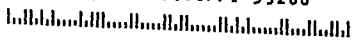
HUGH HOFFMAN, PRESIDENT
RELIGIOUS VACATIONS, INC.
524 NE 16 COURT (CORNER NE 5 TERR.)
FORT LAUDERDALE, FL 33305-3095
305 763 8400

FORWARD & ADDRESS CORRECTION
REQUESTED



MR ROBERT ABBEY
DISTRICT MANAGER
BUREAU OF LAND MANAGEMENT
411 BRIARWOOD DR
SUITE 404
JACKSON, MISSISSIPPI 39206

0 USPS 12/7

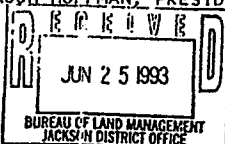


DEAR MR ABBEY, MY THANK FOR GOOD WORK U'R DOING!!!
MY ENTIRE FAMILY & RELIGIOUS VACATIONS, INC., ARE

VERY MUCH OPPOSED TO ANY OIL DRILLING IN THE
FLORIDA EVERGLADES.

WE ARE ALL REGISTERED VOTERS & WE VOTE & WRITE
GOVERNORS, PRESIDENTS, SENATORS, ETC.

SINCERELY & BEST WISHES. HUGH HOFFMAN, PRESIDENT
6-21-93



B-4

Shell Oil Company



Hillsboro Center
600 W. Hillsboro Blvd.
Suite 250
Deerfield Beach FL 33441

Florida District

May 17, 1993

Mr. Robert V. Abbey
District Manager
Bureau of Land Management
411 Briarwood Drive, Suite 404
Jackson, Mississippi 39206

Dear Mr. Abbey:

I am the District Manager for the Retail Operations of Shell Oil Company in Dade, Broward and Palm Beach Counties. The proposed exploratory well to test potential hydrocarbon bearing formations does not affect me or my duties directly, but the progress of the Exploration and Production (E&P) side of the company affects every single employee of Shell Oil, Shell stockholders, and our customers at the pump.

As a resident of South Florida and a Manager with Shell Oil Company, I have never found a conflict of interest with regard to my responsibilities to the environment and the manner in which Shell is sensitive and responsive to environmental regulation, concerns and issues.

I have read the Draft Environmental Impact Statement and the conclusion indicated that no significant impacts were anticipated in any of the areas identified during scoping.

The DEIS also addressed the No Action Alternative and found that the results of no action would be potentially negative for the Miccosukee Indians who would not realize potential revenue from the development of the oil and gas lease and local jobs would not be generated.

I have seen South Florida devastated by the affects of Hurricane Andrew, and for six weeks following the storm most of my work time and the time of my retail staff was spent organizing and participating in community service at a relief tent that Shell set up in Homestead. Now more than ever, South Florida needs to explore and expand its revenue opportunities.

The DEIS suggests that this revenue opportunity presents only slight impacts to the environment and it characterizes them as insignificant due to the short-term nature and/or their low magnitude of disturbance to the human or natural environment.

B-5

Mr. Robert V. Abbey
Bureau of Land Management
May 17, 1993
Page 2

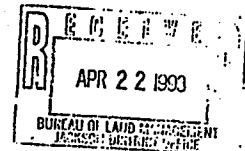
I am writing to support the findings of the DEIS and encourage you to look favorably upon a plan that would be good for the economy of South Florida and would not pose a harm for our Everglades and Big Cypress Swamp environments.

Sincerely,

R. F. Gardner
R. F. Gardner
Southeast Florida District Manager
cc: J. E. Little (OSP 4401A)

B-6

Jackson District Office
Bureau of Land Management
411 Briarwood Drive
Suite 404
Jackson, Mississippi 39206



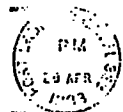
To whom it may concern:

As a south Floridian who values the environmentally sensitive Everglades, I am adamantly opposed to Shell Oil's plans to drill for petroleum there. No number of precautions can assure that contamination will not eventually occur, due either to a natural or human-induced disaster. I urge you to make all efforts to thwart Shell's plans to exploit the Everglades... before it is too late for our wildlife, our economy, our water supply, and the preservation of the unique and natural beauty of the Everglades.

Very Concerned,

Mark Lumsden

Law Office
SPELLACY, LESCANO AND DUCKETT, P. A.
613 SOUTHEAST FIRST AVENUE
FORT LAUDERDALE, FLORIDA 33301



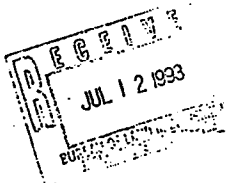
Jackson District Office
Bureau of Land Management
411 Briarwood Drive
Suite 404
Jackson, Mississippi 39206

39206-3039 17

O-1

Patricia Meacham
12227 N.W. 31st Street
Sunrise, Fla. 33323
4/26/93

Bruce Babbitt
U.S. Dept. of the Interior
1849 C St. N.W.
MS 6218
Washington, D.C. 20240



Dear Secretary Babbitt,

I am from Arizona, and so was delighted when you became Secretary of the Interior. I know that you are a caring person with a genuine concern for the environment. That is why I am writing you about Shell oil drilling in the Everglades. As you know, the Everglades is a unique treasure and must be saved. Of course unless action is taken now, it will no doubt be too late to save the Everglades as well as the other parts of the system like Florida Bay, Lake Okeechobee and so forth. as Conservation Chair for Broward Audubon, I am asking you to please stop Shell. The last thing the Everglades needs is more stress on its already over stressed system.

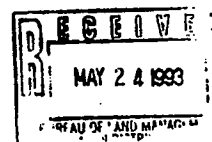
Thank you,
Patricia Meacham
Patricia Meacham
Conservation Chair Broward Audubon

O-2



CLEAN WATER ACTION

May 18, 1993



Robert V. Abbey
District Manager
Bureau of Land Management
411 Briarwood Drive, Suite 404
Jackson, Mississippi 39206

Dear Mr. Abbey:

Clean Water Action, an environmental advocacy group with over 50,000 members in South Florida, is submitting, in the form of this letter, written comments on the Bureau of Land Management's (BLM) Draft Environmental Impact Statement (DEIS) -- regarding Shell Oil's proposal to drill for oil in the Everglades. As you are aware, Clean Water Action submitted verbal comments on the DEIS at your April 14, 1993 public meeting.

We have a number of concerns both about the proposal and the DEIS itself.

First, regarding the proposal, let me summarize our concerns with this single statement: it is Clean Water Action's position that the Everglades -- home to America's most endangered national park -- is the last place in the world where we should be prospecting for oil.

Regarding Clean Water Action's specific concerns about the DEIS, our objections follow:

- 26 | • The information contained in the DEIS is incomplete, outdated
- 85 | and in many instances inaccurate. The DEIS needs to be
- 13 | redrafted to correct these errors and a new hearing and review
- 14 | process needs to be conducted on the revised DEIS.
- 25 | • Cumulative impacts on the ecosystem, potential impacts on
- 9 | public water supplies, the impact on State land use programs
- 8 | and, most importantly, complications regarding as-yet-to-be-
- | drafted Everglades Restoration Plans, need to be considered in
- | their entirety in the revised DEIS.
- | • The BLM's treatment of alternatives in the DEIS was grossly
- | inadequate and in our opinion defies the spirit of the National
- | Environmental Policy Act -- a law designed to guarantee
- | that the public interest is protected in matters such as the
- | one before you. The three alternatives listed in the DEIS were
- | little more than three configurations of the same alternative
- | and the no-action alternative was not adequately explored.

1320 South Dixie Highway, Suite 1140, Miami, FL 33146 • (305) 661-6992 • FAX (305) 661-7645
P.O. Box 137, Big Pine Key, FL 33043 • (305) 872-3725

O-3

Indeed, the no-action alternative was all but ignored in the DEIS. We expect a revised DEIS to include a thorough analysis of real alternatives, including a complete analysis of the no-action alternative. The analysis of alternatives should identify what, specifically, the public interest is in the proposal and how that interest may be harmed or served by the project.

- Finally, we respectfully request that the final decision to approve or deny this project be made at the highest levels of government -- by the Secretary of Interior, Bruce Babbitt. We feel that in light of Mr. Babbitt's public pronouncements signaling his commitment to protecting the Everglades, he himself must make the final decision on this project, as it has the potential to severely undermine his Everglades protection initiatives.

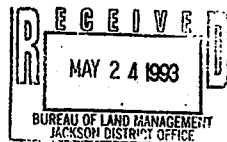
We would appreciate a response to this letter within thirty days. Thank you for your consideration.

Sincerely,

Tom Weis

Tom Weis
Florida Program Director

O-4



April 22, 1993

Dear Shell Oil Company,

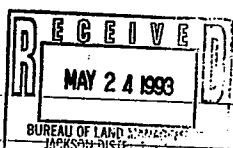
I think it is a bad idea for you to have an oil dig in the Everglades. There are a lot of animals there and if your company has an oil spill it can hurt the animals. They might even get killed.

There are also a lot of trees in the Everglades. They give us air and they are beautiful. Please don't hurt them.

From,

Adam (a consumer)

O-5



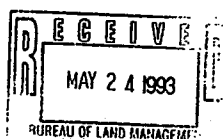
Dear Shell Oil,

If you want to drill in the everglades you will pollute. Air, water and a lot of other things. You would be taking away our drinking water. If your coverage for spills doesn't work it will kill many animals. Plus do you want our prophets in Florida to drop back if some tourist may need gas and might come to you? Doesn't that sound good? I used to come to you sometimes, but now I won't come anymore. Plus I'll make sure others won't. You can't. I'm scared you should be. More people can pass words around not to come to you. People will boycott you. While they boycott you will lose money and I don't think you want that. I would think twice about drilling in the everglades.

Your Ex-customer,

Adinah

O-6



4/22/93

Dear Shell,

My name is Jeannie Barel and I'm 13 yrs. old. I live in Fort Lauderdale Florida. I go to a school called The David Posnack Hebrew Day School. I'm on the recycling board in my class. I'm the Vice-Chairperson. I'm very into the Earth (Peace), Recycling, and Nature. I think that your company is making a big, huge, gigantic, enormous mistake by going to dig in the Everglades for oil. There are so many helpless animals that will die because of Shell. There are many alligators, crocodiles, birds, fish, and other little creatures that live there. I think that if Shell can not find another source of oil you should ~~either~~ shut down your company or combine ~~businesses~~ ^{businesses} with another gas company. There are plenty of oil companies such as Amoco, Mobil, Exxon, Hess, or BP. If you were a little animal you wouldn't want people coming and digging up your home!! I'm only in seventh grade and I understand that you don't go around destroying things just to make money. I promise that if Shell goes through with this idea I will never buy gas from any of their stations. I'm very upset with your ^{company's} ~~companies~~ decision, especially with the same name Shell. I mean, Shells are on the beach and you will be destroying all the same animals that live on the beach plus shells, so you will be destroying your own name. You and your company will be destroying a beautiful place, and believe me I've been there to see it for myself....Have You!!!!!!?

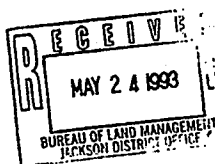
Sincerely
A Concerned 7th Grader

Jeannie Barel
Jeannie Barel

O-7

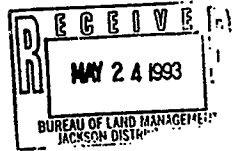
To Whom It may concern,

I don't think you should do drilling in the Everglades, because ~~you~~ you will ruin it: like the fish and the alligators and people won't be ~~allowed~~ allowed in. Where are birds going to go? People won't use your oil. You will lose money and might go Chapter 11, so you better not drill



Unsincerely,
Josh Burman

O-8



To Whom it may concern,

What you are going to do is absolutely disgusting. Everybody knows that we are threatening the Everglades. They are already being destroyed. You will destroy it even more.

My family and I have been very loyal customers, but now that we know you are going to drill we will no longer use your gasoline for my car and I will do everything in my power to influence my co-workers not to use Shell Oil unless you do not drill. I live in South Florida and I want to see the Everglades last. If you do decide to ignore this letter and will drill, prepare to lose many customers

Sincerely,
Ex-customer Anna Charlin

O-9



O-10



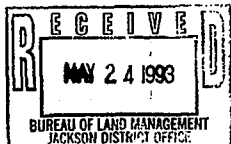
To Shell Oil,

Just lately, I heard about the fact that you would like to drill in the Everglades. The Everglades is a beautiful place. It is also a natural place, untouched by people except for tourists, who are just touring! The people whom I work with also disagree with your opinion. Until now, my family and I have been loyal customers, we hardly fill our tanks anywhere else. Close your eyes for a minute. Imagine yourself as a bird, a dying bird. Your only thought is, "I'm covered with Shell Oil, I'm dying because of Shell Oil." Still won't change your minds? Let me make my message clearer with a few phrases. "If you spill it, or even if you don't, with yours I won't fill it, believe me, I won't. Or, "Make the wrong choice and we'll all be one voice, we will arise, and reveal the strength of your Res." "I was loyal, loyal as dawn, I was loyal, but now I'm gone." Try. Don't try, Shell Oil, your plan will just spoil. Still not convinced? Well, when I was a child, I saw the Everglades with my dad, Bless his poor soul, and was delighted with what I saw. Don't destroy that vision of mine. We all know it will be profitable, but is it worth it? Is it worth losing customers, including my family and I? Think it over, and if you're still not convinced, you're either unhuman or you are just wrong. Think about it.

Sincerely,
Mona Macken

O-11

O-12



April 20, 1993

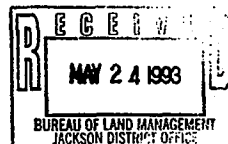
Dear Shell Oil Company,

I totally disagree with you, I feel there should be no oil drilling. I feel that way because the drilling will kill animals, pollute our world, and pollute our lakes, rivers, and oceans. I feel you should think more of what you are doing to our economy before you start drilling.

Sincerely,

Miriam Friedman

Student of the
Sunrise Hebrew
Day School.



Dear shell oil,

I think your idea to drill in the everglades is horrible. I live in Florida, and I am concerned about the water I drink. Your wells won't do much if there is a spill. In the She Hen Island it is still a mess. I use your oil but once I heard from my science teacher that you are going to drill in the everglades I told my parents to never ever use your oil ever again. It is very bad that you even thought about drilling in the everglades. If you keep this up Florida's waters will be ruined. All of the animals would die. How would you like it if you got killed by a oil spill? If you keep this up every one will boycott your co. So stop or you will drop with your bad fortune.

Sincerely,

Matthew Glick
MATTHEW GLICK

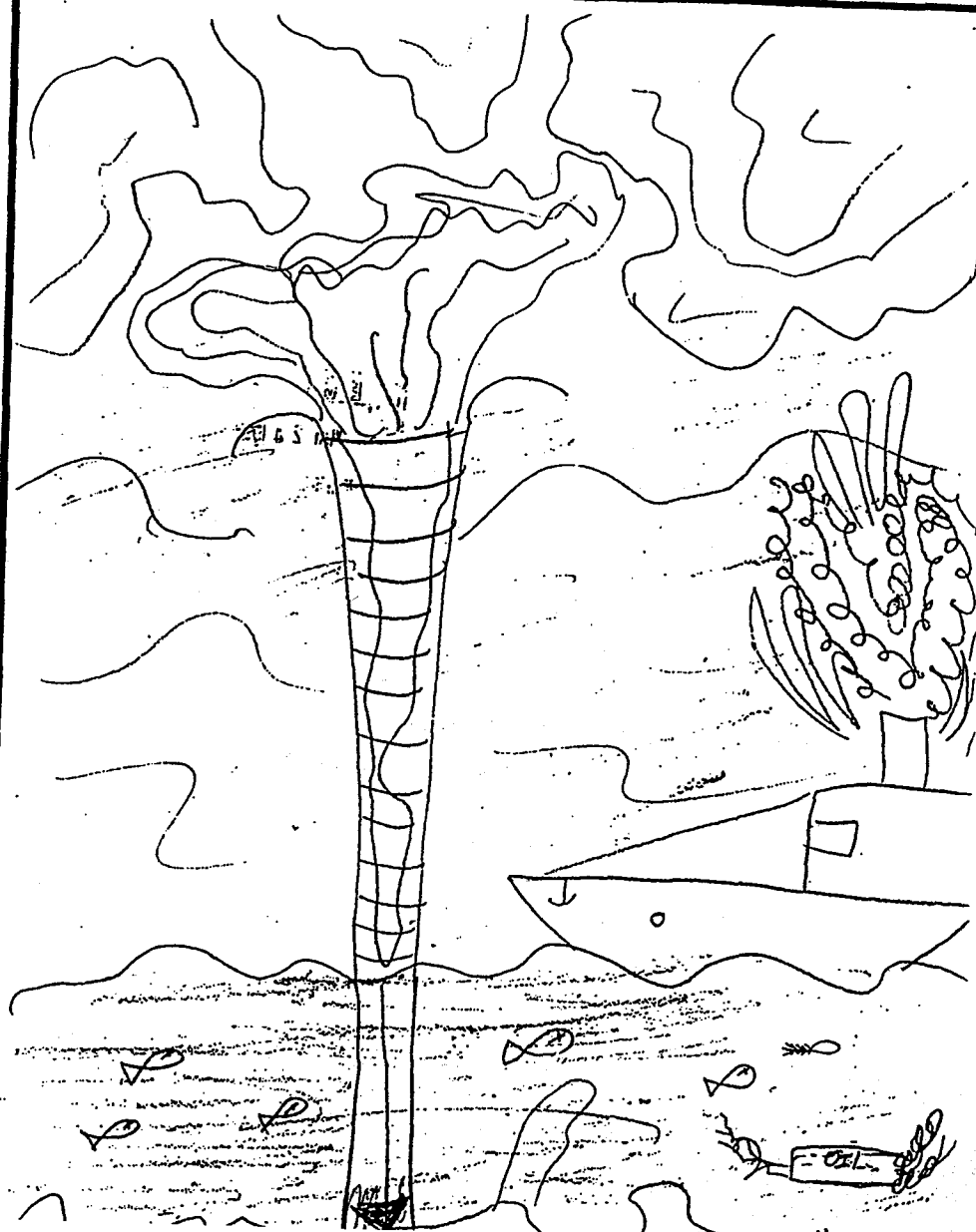
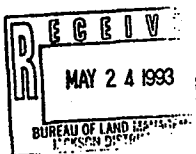
O-13

O-14

Dear shell co,

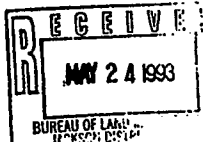
I think your idea to drill in the everglades for oil is horrible. If you do this the everglades will be ruined. All the animals will die and people would not come to tour the everglades. If I were you I would not do this. If people will find out I doubt they would not use your oil.

From,
Matthew Glick
MATTHEW GLICK



O-15

O-16



Dear Shell Oil,

As you probably know, the Everglades is a national park which means you aren't allowed to destroy it unless you have government permission. I hope you realize that you aren't doing this for oil or for money and most of you are behind it, sad but true. I admit that I'm an environmentalist and when I was a kid I went to the Everglades. You probably realize that while you are off killing animals, others (like me) wouldn't hurt a poisonous fly. Again sad, but true. As I said I've been to the Everglades. I've seen the joy, the happiness, the sense of freedom that goes on there. If you destroy it you are destroying a part of many people I hope I've made a point.

Sincerely,

Anna P. Grossman

Anna P. Grossman



Dear Shell Gasoline Company,

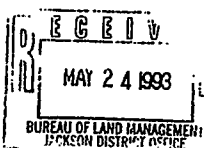
4/2/93

I heard that you plan to drill for oil in our precious Everglades. It is a bad idea. Do you want to know why. It is bad because you are killing not only animals that live there but the homes they live in. Another reason is because the Everglades is a tourist attraction for tourists. I have a feeling if everyone hears about this you will have no more customers.

Thank you,
Sincerely,
Beth Horowitz

O-17

O-18



Dear Shell,

You should not dig in the Everglades because a few years ago Exxon had the biggest oil spill in history and they had modern technology. You could spill oil on harmless trees and animals. It is bad for the environment. It is not worth paying for trees that you could kill or animals. It is bad. If you people read the newspaper & watch politics everyone is trying to conserve, recycle, etc. Our vice-president Al Gore has a book. You've lost a customer when I drive.

Yours Truly,

Daniel A. Isaacson
Daniel A. Isaacson

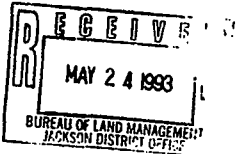


Dear Shell,

I don't think drilling in the Everglades is a good idea. You shouldn't drill in the Everglades because you may destroy the area. Are you going to watch if there is an oil spill, or are you going to do something.

Sincerely,
Bryan Hinzbrunner

O-19



To whom it may concern,

Why are you doing this? To make more money.

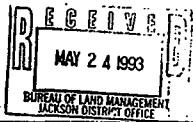
Listen if you want to make more money don't drill in the Everglades. I saw a show once that a high school class took animals out of a lake near their school. One day they found oil. They put the animals back just in time for an oil spill. They tried to help the animals but it was too late. Listen you can get some oil on a shirt and clean it up (no harm) But if you have an oil spill you can't clean it up. You'll kill all the animals. If you have an oil spill can you promise it won't happen again.

Sincerely,

Jessica Kobrynec

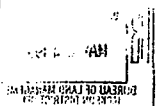
Jessica Kobrynec

O-20



Dear Shell oil I've heard of your rotten plans to drill in the everglades. I remember as a child sitting on the floor in front of the TV there was a shell commercial on C-shell service with a smile as a child might say not! I think you should change your commercial to oil that's not loyal because your not any one who looks at this lovely park and thinks of oil and how unsafe it is. My main question is why? why? Can't you drill somewhere else think of the animals and plants imagine your a little baby bird or even an alligator you leave your home and run around & play when you come back your home is smashed into little bits. All because of the drills belonging to who else shell oil? What if you don't find much oil all that time of money wasted and now you probably lost plenty of customers including me. I have 1 thing to say & I like the Everglades actually I love it if you don't

O-21



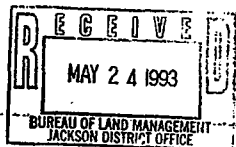
Dear Shell,

Your Enemy

Pamela

Love

O-22



Dear Shell,

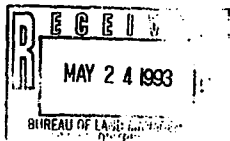
I don't think you should drill in the Everglades!! You might kill animals and you may ruin the Everglades. If there is an oil spill many animals may be killed. We need the Everglades in Florida. Please don't kill the animals and ruin the Everglades.

A concerned citizen of Florida

Sincerely,

Zelma Lee

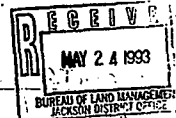
O-23



Dear Shell oil company,
I am very concerned about you
ruining the Everglades. What people
do is wrong. People shouldn't ruin it.
Because soon it will be gone.
When I went to the Everglades, it was
very beautiful to look at. By getting
oil out of the Everglades you
are ruining such a beautiful
piece of land.

Sincerely,
Arielle
Meyer

O-24



9/28/93

To whom it may concern,

I'm very concerned about the
Everglades. I don't want you to drill
there. If you do, you are destroying a
beautiful place for everyone. You are
also destroying a part of South
Florida's water supply. You say you are
taking all the necessary precautions,
but when there is a spill your
walls won't work. If you destroy
the Everglades you are destroying a
place where more than half the money
from tourism comes from. If you drill
many people will stop going to the
Everglades because all they would see
would be things covered in oil
and oil geyser. The consequences
for your actions will be that
many people will boycott Shell.
When all the kids in the United
States grow up and drive a car
anyone of them who cares about the
(Lut)

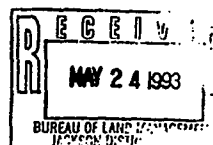
O-25

animals or the plants in the Everglades
wouldn't buy Shell oil or gasoline.
Then when nobody buys from
Shell you will wish you never
drilled in the Everglades.

Sincerely,
Jeremy Moskowitz
Jeremy Moskowitz

5th Grader in Mrs. Bronson's class
in the David Posnack Hebrew
Day School.

O-26

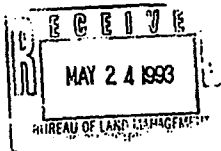


To whom it may concern,

Do you want to be hit in your
pockets? I don't think so. My mom only uses in
Shell gas, but she can always change. That is if we
want to. Please don't destroy the Everglades.
The Everglades are one of the main attractions of FL.
Please don't destroy them.

One of your costomers,
Elizabeth Ollila

O-27



Dear Shell oil company,

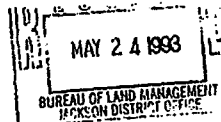
Hi I'm not much of an ever person but I'm into animals please don't drill you can hurt the animals and the beautiful everglades you guys are pouring oil on the animals what if they poured oil on you how would you feel and we murdered you for dumb shell gasoline please each animal you kill your killing family and friends please you know I'm making a point here

Thanks

Dawn Sciffiano

Dawn Sciffiano

O-28

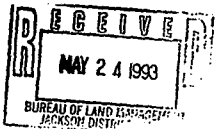


To whom it may concern,
I think that it would be wrong to dig for oil in the Everglades. There are so many beautiful trees, plants & animals there. If there was an oil spill think of all the trees, plants & animals you could kill. Most of the Everglades has been burned we would like to keep the little part we have left clean & looking great!

Sincerely,
Danielle Sherman

P.S. Please think it over again!

O-29



To whom it may concern,

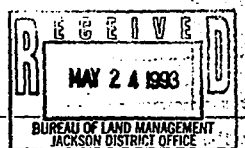
April-28-93

I am very concerned about the Everglades. I don't want you to drill in the Everglades. If you do you are going to destroy plants and animals. You already stole the land away from the Indians. What are you going to do next? It has to stop now because if you don't there isn't going to be any Everglades. You are also going to be destroying part of South Florida's water supply. I know you are going to be taking many precautions but what if that's not enough. Please take this into consideration.

Sincerely,
Paul Thomas

P.S. If you do this people will boycott shell oil.

O-30



To Whom it may concern,

Did you know that your oil is destroying life? Plants, animals, and people. In the everglades, many animals live there. You are destroying the earth by drilling oil out of the everglades. The ozone layer is very thin, before anyone knows it, the people in the future will have to wear thick suits because they'll be burned to death without them. I'm in fifth grade and even though I'm just a kid I'm very, very, very concerned. If you can do something about this please help!! Thank you for your cooperation, maybe.

Sincerely,
Erin Thomas

P.S. there's a picture on the back

O-31

RECEIVED
MAY 24 1993
BUREAU OF LAND MANAGEMENT
JACKSON DISTRICT OFFICE

to whom Ever this may concern,

I have heard that shell oil co. is planning to drill in the Florida Everglades. I am shocked! Do you know how important the everglades are? I guess not if you want to dig for oil there. You say it will be safe. How can you guarantee? I guess not. You probably know the damage done by oil. Exxon screwed up what will happen to the Everglades. Exxon is still cleaning up the birds and water and animals. What will happen to the everglades? Don't drill!

Sincerely

Yakov
Colish
Yakov
Colish

O-32

RECEIVED
MAY 24 1993
BUREAU OF LAND MANAGEMENT
JACKSON DISTRICT OFFICE

Dear Shell Oil,

If you drill, you will kill many plants and animals and you won't even be needing the oil because if you do this you will lose many customers including my family and myself. You are hurting yourself also because soon you will have to get used to saying "Would you like fries with that order?" Please don't do this because you are offending everything and everyone especially yourselves.

Yours ex customer,

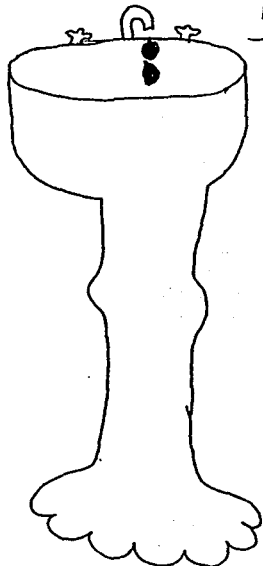
Baylene Wicks

P.S. I'm going to tell everyone I know not to use Shell.

Unless you stop the drilling.

O-33

SHELL OIL
IS DOWN THE
DRAIN IN MY
HOUSE



O-34

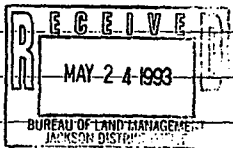
RECEIVED
MAY 24 1993
BUREAU OF LAND MANAGEMENT
JACKSON DISTRICT OFFICE

To whom it may concern,
I think that you should not dig for oil in the everglades because there are already too many "homeless" alligators, crocodiles, and tropical birds. Then they go into pools, lakes, and canals therefore letting people get harmed from the bites.

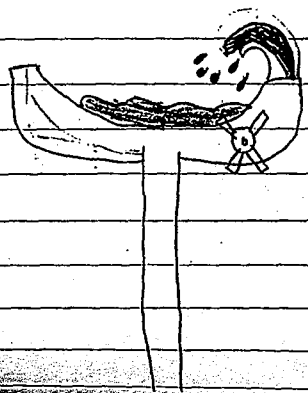
From, an ex-member, and
consecrated 11 year old,
Natan Joseph Gold

O-35

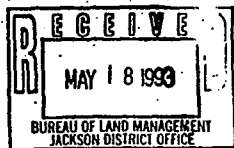
O-36



Would you like to
drink oil.



ENVIRONMENTAL COALITION



XXX3057447857XX
(305) 779-7283

521 South Andrews Avenue, Suite 3
Ft. Lauderdale, FL 33301
May 14, 1993

Robert V. Abbey
District Manager
Bureau of Land Management
Jackson District Office
411 Briarwood Drive, Suite 404
Jackson, Mississippi 39206

Dear Sir:

The Environmental Coalition of Broward County (ECBC) has reviewed the Draft Environmental Impact Statement for the proposal by Shell Western E&P Inc. to drill an exploratory well on the Miccosukee Indian Reservation located in Broward County Florida. We have found a number of flaws and inadequacies that should be addressed and included in a supplement to the DEIS before a final EIS can be prepared:

- 25 - The DEIS fails to consider the effects of the Everglades Restoration Plan whose implementation will significantly alter the hydrology of the Kissimmee-Okeechobee-Everglades System where the drill site is located. Impacts on water resources and wetlands, in particular, should be considered in the context of the Everglades Restoration Plan.
- 8 - Treatment of the "No Action" alternative is incomplete. A full analysis of this alternative is necessary in order to fairly weigh its impact as compared to the other alternatives.
- 26 - Much of the information used in the DEIS is from outdated sources or was obtained using outdated techniques. Recent data from local and regional agencies is in conflict with DEIS data relating to the structure and location of regional aquifers, surface hydrology and the range of habitats of endangered species. Both the South Florida Water Management District and the Broward County Department of Natural Resources Protection have made specific comments concerning the inadequacy of the supporting data in the DEIS.
- 85 - The DEIS evaluates the probability of the occurrence of brine spills, oil spills and natural disasters but fails to address the probable consequences of such events for natural flora and fauna. An evaluation not only of the probability but of the consequences
- 86

O-37

O-38

of accidents and catastrophes is essential for a meaningful risk analysis.

- The DEIS does not deal adequately with the impacts on public water supplies. A complete Sole Source review of this project should be completed by the U. S. Environmental Protection Agency (EPA) and the final comment period extended to allow review of the EPA report.

- Potential cumulative impacts are dismissed without adequate consideration, especially as relates to water resources, wetlands, and natural vegetation and wildlife.

Please contact the ECBC if you require any further elaboration or information relating to our comments.

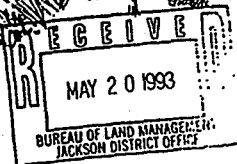
Sincerely,

Dianne Petitjean

Dianne Petitjean
Coordinator

EC
VF

Mr. Robert V. Abbey
Bureau of Land Management
411 Briarwood Drive
Jackson, Mississippi 39206



Dear Mr. Abbey:

16 May 1993

This Council has considered the matter of the proposed Shell Oil Co. drilling in the Everglades of Florida.

It is the opinion of this council that there should be no expansion of oil related activities in the South of Florida until two conditions have been met:

- The Everglades have been restored to a healthy functioning eco-system;
- There is a national critical energy shortage declared by the President.

Since neither of these exist at present, we oppose issuance of a drilling permit.

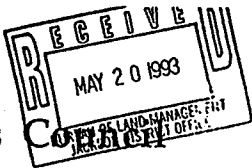
By direction of the Council at it's meeting of 12 May.

Respectfully submitted:

R.P. Haviland
R.P. Haviland, PE (Ret.)
Corresponding Secretary
1035 Green Acres Circle, N.
Daytona Beach FL 32119

O-39

Environmental Leaders of South Florida



Consensus Position Re:

Proposed Miccosukee 3-1 Oil Well, Draft EIS, APD

Mr. Robert V. Abbey
District Manager
Bureau of Land Management
411 Briarwood Drive, Suite 404
Jackson, Mississippi 39206

May 18, 1993

Dear Mr. Abbey,

The undersigned organizations of South Florida have joined to offer you our consensus position concerning the above-referenced proposal to drill for oil in the Everglades. We, individually, have much detail to add and intend to do so in additional written comments from each of our groups, to be sent to you under separate cover. However, for the purpose of emphasizing how important certain issues are to us, we have listed, and do agree on, the following points:

- The information in the Draft Environmental Impact Statement (DEIS) is incomplete, outdated, and in conflict with local knowledge and testimony given at the DEIS hearing. The DEIS must be redrafted to correct errors in matters of fact and that a new hearing and review be conducted on the revised draft. 26 85
- The new draft should include previously omitted information as it relates to cumulative impacts, public water supplies, Everglades Restoration Plans and Problems, and Florida land use programs. Discussion of the Florida Executive Order banning commercial development in the Everglades Water Conservation Areas and the effects of this project must be included. 25 52
- The treatment of alternatives in the Draft EIS was completely unsatisfactory to us and to the requirements and spirit of the National Environmental Policy Act. The alternatives listed were in fact the same option in three configurations. We expect a new DEIS to include real alternatives, fully discussed, including a serious discussion of the no-action alternative, alternative energy sources, and of alternatives offsite. The discussion of alternatives should identify what is, in fact, the public interest in the proposal and how that interest can be served or harmed by the project. 9 8 9

1

O-40

• The DEIS glossed over how this proposal was affected by federal Executive Orders 11990 and 11988. A serious discussion of this issue must be included if any meaning is to be attached to these safeguards of the public welfare and public wetlands.

• We join to reissue the request for a complete Sole Source Review of this project by the U.S. Environmental Protection Agency (EPA). We would request that the final comment period for the DEIS be extended to sixty days after the publication of the EPA report on the matter.

We ask that you reply to this letter within thirty days so that we may have an opportunity to respond and pursue whatever actions may be appropriate before your decision on the APD is final.

Sincerely,

Joe Podgor, Executive Director, Friends of the Everglades, 101 Westward Drive, #2, Miami Springs, FL 33166; Ph: 305-888-1230

Roderick Tirrell, "Sierra Club of Broward, 5431 NE 25th Ave., #303, Ft. Lauderdale, FL 33308; Ph: 305-772-3865

Ann Murray, "Broward County Native Plant Society, 608 SW 7th Ave, Ft. Lauderdale, FL 33315; Ph: 305-523-0288

Georgia Reynolds, M.D., 1990 Recipient, Theodore Roosevelt National Conservation Award, 360 NW 65 Ave., Plantation, FL 33317

Barbara Zias, President, "Broward County Audubon Society, 4030 NE 17th Terrace, Oakland Park, FL 33334

John R. Judy, President, "Environmental Coalition of Broward County, 1073 West Country Club Circle, Plantation, FL 33317

Helen Hirschfeld, 202 SW 63 Ave., Plantation, FL 33317; Ph: 305-791-5740

Dianne Petitjean, Editor, *Environmental Advocate*, 521 S. Andrews Ave, #3, Ft. Lauderdale, FL 33301; Ph: 305-351-0362

Patti Webster, Director, The Real Wetlands Coalition of Florida, 5215 SW 91st Terr., Cooper City, FL 33328; Ph: 305-779-7283

Eve L. Savage, Former Broward County Commissioner, 252 SW 61st Ave., Plantation, FL 33317

2

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Freddy Fisikelli, Everglades Coordinating Council, 22951 SW 190 Ave., Miami, FL 33170

Manley Fuller, President, Florida Wildlife Federation, P.O. Box 6870, Tallahassee, FL 32311; Ph: 904-656-7113

Joette Lorion, Energy Advisor, Greenpeace, 7269 SW 54th Ave., Miami, FL 33143; Ph: 305-661-2165

Tom Martin, National Audubon Society, P.O. Box 5608, Ft. Lauderdale, FL 33310-5608; Ph: 305-790-7918

Nancy Magglacono, President, League of Women Voters of Florida, 540 Beverly Ct., Tallahassee, FL 32301; Ph: 904-224-2545

Tom Wels, Florida Program Director, Clean Water Action, 1320 South Dixie Highway, #1140, Miami, FL 33146; Ph: 305-661-6992

Barbara Powell, Everglades Protection Society, 22951 SW 190 Ave., Miami, FL 33170

Ann Whitfield, Executive Director, Florida Public Interest Research Group, 420 E. Call St., Tallahassee, FL 32301; Ph: 904-224-5304

*Affiliations listed for identification purposes only.

3

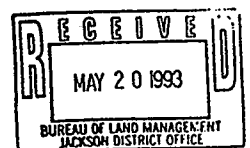
O-42

Florida PIRG

420 East Call St., Tallahassee, FL 32301

May 18, 1993

Robert V. Abbey
District Manager
Bureau of Land Management
411 Briarwood Drive, Suite 404
Jackson, Mississippi 39206



Dear Mr. Abbey:

The Florida Public Interest Research Group (Florida PIRG) submits the enclosed comments on the Draft Environmental Impact Statement (DEIS) dated March 8, 1993, for the proposed Miccosukee 3-1 well in Broward County, Florida.

Per telephone conversations with your staff, we are sending these comments postmarked May 18, 1993, to meet the published deadline for comments.

Thank you for your attention to these issues and concerns. Please advise us as to additional opportunities for public input on this proposal and relevant documents, whether those opportunities be in public fora or in written form.

As noted in the attached comments, we urge you to reject the application for this exploratory well.

Sincerely,

Ann Whitfield
Ann Whitfield
Executive Director

William A. Wood
William A. Wood
Researcher

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Florida PIRG

420 East Call St., Tallahassee, FL 32301

Comments of the Florida Public Interest Research Group (Florida PIRG)

to the Bureau of Land Management (BLM) and the
Bureau of Indian Affairs (BIA) on the

Draft Environmental Impact Statement
Shell Western E&P Inc.
Miccosukee 3-1 Exploratory Well
Miccosukee Indian Reservation, Broward County, Florida

May 18, 1993

The Florida Public Interest Research Group (904) 224-5304

Thank you for the opportunity to comment on the Draft Environmental Impact Statement (DEIS) dated March 8, 1993, for Shell Western E&P Inc.'s (SWEPI) proposed Miccosukee 3-1 Exploratory Well. Florida PIRG is a statewide non-profit, nonpartisan citizen organization that has worked on environmental and consumer protection issues in the state for the past twelve years. Florida PIRG has actively opposed drilling for oil and gas in the Everglades for several years. The organization has over 60,000 members from Key West to Pensacola.

Florida PIRG believes that the proposed exploratory well poses an unnecessary risk to Florida's environment and economy. We find the DEIS to be deficient and inadequate because, among other reasons, it

- * does not adequately address the substantial impacts likely to result from production of oil and/or gas, should the proposed test well discover such reserves;
- * does not assess alternatives such as energy efficiency and renewable energy sources to provide equivalent energy resources to the nation;
- * does not place the expected finds of oil and/or gas -- which are minimal -- within the context of the nation's energy needs, nor weigh this minimal gain against the risk posed to one of the nation's premiere environmental resources; and
- * does not take into account the serious problems in the environmental record of the parent company of the applicant, Shell Oil Company.

More detailed comments on each of these points are below.

I. The DEIS does not adequately address the substantial impacts likely to result from production of oil and/or gas, should the proposed test well discover such reserves.

The DEIS states that "Production of the single well or field development are not proposed or reasonably foreseeable and are not subject to review in this DEIS" (p. S-5). The DEIS also notes, though, that "while field development is not proposed, probable or reasonably foreseeable, it is possible; otherwise the SWEPI Miccosukee 3-1 well would not be proposed" (p. 1-7). The DEIS presents rather tortured logic, we feel, to make the case that "production and field development are not a 'connected actions' [sic] to the proposed action (exploration well drilling, evaluation and testing)" (p. 1-6).

If Shell believes that the possibility of locating productive hydrocarbon reserves justifies the expense and effort of the exploratory well, then the DEIS should contain an environmental assessment for the impacts of production and field development, not just the single exploratory well. In this case, that of foreseeable production, there would be no exploration without the likelihood of production. It seems arbitrary and unfounded to not require the DEIS for the exploratory well to address in some substantial fashion the potential impacts of production (independently of later EIS requirements for a full-scale production plan).

The National Park Service, like the BLM a unit of the Department of the Interior, has recognized the integrally connected nature of exploration and production in an earlier document dealing with Shell's proposed seismic explorations in the nearby Big Cypress National Preserve, prior to this drilling proposal.

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Oil and gas activities should be viewed as an interconnected series of phases. These phases are exploration, drilling, development, production, and abandonment. Geophysical survey operations, such as those proposed by Shell Western, are associated with the exploration phase...

...seismic operations, for the purposes of environmental impact analysis, should be viewed with the possibility of subsequent developmental phases occurring. Furthermore, a comprehensive examination of possible impacts, including cumulative effects, is necessary since it cannot be assumed that exploration operations will in all cases be insignificant and fruitless.

"Environmental Assessment, Oil and Gas Plan of Operations: Big Cypress National Preserve, Geophysical Survey, Shell Western E & P Incorporated." Prepared by Division of Resource Management Specialists, Big Cypress National Preserve, National Park Service, United States Department of the Interior, December 1987, p.6.

If seismic explorations need to be considered in the light of possible cumulative effects from later production, certainly an exploratory well should fall within the same consideration. Exploration does not exist without the goal of production. Production and its associated environmental impacts are possible end results of this proposal, which the DEIS fails to address. This makes the DEIS deficient and inadequate.

Another possibility which several environmental groups have raised is that the point of Shell's proposal could be to drill in order to establish a precedent for drilling in unique and extremely fragile ecosystems. In that case, whether hydrocarbons are actually found in this particular case would not be important for the achievement of the real goal of the project, and it might be "reasonable" to put great effort and expense into an exploratory well that is unlikely to lead to any production. If this is in fact Shell's real goal, it makes the project all the more unacceptable.

II. The DEIS does not assess the capability of alternatives such as energy efficiency and renewable energy sources to provide equivalent energy resources to the nation.

According to the DEIS, the scoping process identified as an issue and concern "eliminating the need for the project by utilizing alternative energy sources, developing an energy policy which encourages development of renewable energy resources, and adopting structured energy conservation measures" (p. 1-4). Though the scoping process identified this concern, and the DEIS claims to address "significant issues and concerns identified through the scoping process," the DEIS fails to adequately and sufficiently evaluate the capability of alternatives such as energy efficiency and renewable energy sources to provide equivalent energy resources to the nation.

We submit that it is part of the role of the BLM and BIA in this instance to recommend to the Secretary of the Interior whether s/he should approve the proposed action, and that such a recommendation should include an evaluation of the environmental impacts of the proposed action and all alternatives. Despite its extremely brief treatment -- a combined total of less than one page in a document of over 500 pages -- in the DEIS, the BLM and BIA apparently have the "means or authorization" (as well as the National Environmental Policy Act [NEPA] requirement) to consider the "No Action Alternative" (i.e., what would be the environmental consequences if the proposed drilling were not permitted).

The DEIS, however, finds that the No Action Alternative would "not meet the purpose and objectives of the project" (p. 2-1), which are defined as "specific geologic objectives [to] provide access to specific geologic targets" (ibid.). Defining the objective of the proposed action this way is an arbitrary narrowing of consideration which predetermines the "necessity" to consider only drilling alternatives. Anyone holding a lease to drill presumably has the objective to drill. The BLM's and BIA's considerations should not be based on the leaseholder's objectives. The BLM's and BIA's role should be to evaluate such proposals as well as all reasonable alternatives, and their associated environmental impacts, in the broader context of the needs of the nation.

The DEIS makes the somewhat oblique comment that "...while no national energy policy exists, an objective of Federal oil and gas leasing programs is to encourage private development of domestic oil and gas reserves to reduce dependency on foreign energy resources" (p. 4-59). While the DEIS apparently aims to take into consideration the "objective of Federal oil and gas leasing programs," it does not adequately consider the environmental impacts of this objective, nor look at all reasonable alternatives.

The brief statement noted above from page 4-59 fails to evaluate, consider, or even mention alternative means to "reduce dependency on foreign energy resources," beyond "development of domestic oil and gas reserves." Such options include most prominently energy efficiency and development of renewable energy resources (solar, wind, geothermal, etc.). For example, the entire estimated remaining oil and gas reserves in South Florida (approximately 14,000,000 barrels of oil equivalent, or BOE; see text of comment "III" below) would be saved with implementation of Corporate Average Fuel Economy (CAFE) standards for cars and light trucks of 40 mpg and 30 mpg, respectively, in a period of less than two weeks. The DEIS presumes, apparently wholly without justification, only one means to achieve the goal of increased energy independence for the nation.

As noted elsewhere in our comments, the DEIS fails to evaluate the extent to which the proposed exploratory well would in fact "encourage the development of domestic oil and gas reserves." Of course, such development could only happen with production of reserves, presumably the reason for exploration, and such production is of course not even cursorily addressed by the DEIS (see our comment numbered "I" above). The DEIS also fails to place potential produced reserves from the proposed exploratory well in the context of total domestic oil and gas reserves (see our comment numbered "III" below), the only context in which one could meaningfully review the extent to which it would "reduce dependency on foreign energy resources."

The DEIS appears to be arguing both sides of a critical point. In looking at the negative environmental impacts of the proposal, the DEIS looks only at exploration and makes an explicit case against including the negative environmental impacts of production. In arguing for the benefits of the proposal, the DEIS points to development and production. To be consistent, which we believe it is not, the DEIS should either look at the negative environmental impacts as well as the benefits of exploration only, or the negative environmental impacts as well as the benefits of exploration along with subsequent development and production.

The rationale stated in the DEIS for not considering the alternative of utilizing alternative energy sources seems flimsy and arbitrary. A consideration of the capability of alternative energy sources to provide equivalent energy resources to the nation should play a prominent role in the environmental review of any proposed extractive fossil fuel exploration and development.

The BLM should recommend to the DOI Secretary, and the Secretary should consider, not simply the question of whether "hydrocarbons are present," but should include this question within the much larger framework and context of providing energy resources to the nation, and the environmental impacts of alternative options. The descriptions of the environmental impacts of any proposal for energy development in the Everglades watershed remain incomplete if they are not placed in the larger context of alternative energy sources. For this reason we find the DEIS to be deficient and inadequate.

III. The DEIS does not place the expected potential finds of oil and/or gas -- which are minimal -- within the context of the nation's energy needs, nor weigh this minimal gain against the risk posed to one of the nation's premiere environmental resources.

The DEIS states that "the well would test the Sunniland Formation and targets below the Sunniland" (p. 1-6). The DEIS further states that "recent statistics indicate the remaining recoverable oil and gas reserves in South Florida are about 13,949,000 barrels and 1,376,000 Mcf, respectively" (Appendix 1, p. 4). (1,376,000 Mcf of gas is equivalent to approximately 245 barrels of oil equivalent -- virtually none -- using conversion figures from the Dept. of Interior's Minerals Management Service [MMS].)

What the DEIS does not do is note that in the context of the energy needs of this country, additional reserves in South Florida are virtually meaningless. The nation consumes the equivalent of approximately 17,000,000 barrels of oil each day. Much of the remaining South Florida reserves noted in the above DEIS citation are already going to be produced from existing wells in locations outside the Everglades watershed. Thus this exploratory well likely has the potential to find oil reserves equivalent to only a small fraction of one day's worth of U.S. consumption.

The cumulative amount of oil and gas produced by the entire South Florida region (the "Sunniland trend") has had virtually no impact on the nation's energy resources. In its entire 60-year history, South Florida has produced approximately 100 million barrels of oil, an amount equivalent to approximately six days of national consumption. The proposed exploratory well will do nothing to "reduce dependency on foreign energy resources," even if exploration leads to production. The proposed well does, however, threaten one of the nation's and the world's premiere environmental resources.

Any potential further discovery and development, for less than one day's supply of the nation's energy needs, should be evaluated in the DEIS in the context of such a "gain" in relation to the risk to the Everglades, and the incomparably greater gain in avoiding this potential danger to this fragile and unique ecosystem. The DEIS does not do this, and is inadequate and deficient because of this lack.

The current DOI Secretary, Bruce Babbitt, has indicated that he considers protection of the Everglades of paramount importance. The proposed exploratory well cannot be divorced from its potential catastrophic impacts to this unique and fragile ecosystem should an accident occur, whatever the degree of likelihood.

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IV. The DEIS does not take into account the serious problems in the environmental record of the parent company of the applicant, Shell Oil Company.

Shell Oil Company has a record of significant pollution of the environment. This record does not appear to be addressed anywhere in the text of the DEIS. We believe Shell's pollution record strongly supports the case against allowing one of its subsidiaries to drill in one of the most fragile and unique ecosystems in the world. A brief review of several points in Shell's pollution record demonstrates the company's lack of environmental responsibility:

* Shell has been held responsible as the primary corporate polluter at a Superfund toxic waste site that EPA termed "the most, or certainly one of the most" contaminated sites in the world. Shell operated a pesticide plant at the Rocky Mountain Arsenal in Denver after military operations at the facility ceased in 1980, and has settled with the federal government to pay part of what was at the time a record \$1 billion clean-up cost. (Please see the attached newspaper article; articles on the other events noted below can be supplied upon request.)

* In April 1988 Shell's Martinez California refinery leaked 441,000 gallons of crude oil into a sensitive nature habitat along upper San Francisco Bay. A state game warden said it may be years before some of the worst-hit areas can again accommodate nesting ducks and other waterfowl. The company later had to pay almost \$20 million for cleanup efforts in a settlement with the government.

* In May 1988 Shell's Norco Louisiana refinery was ripped by an explosion in its catalytic cracking unit that killed at least one person, caused damage to hundreds of neighborhood homes, and caused shutdown of the 220,000 barrel/day refinery and a nearby Shell chemical plant.

* In September 1989 Shell's Martinez refinery had a huge explosion and fire. Press accounts described "shooting flames more than 100 feet into the evening sky and spewing tall columns of dense smoke visible 40 miles away," according to authorities.

* In April 1990 Shell's refinery in Carson California was found to have at least 25 defective welds on piping that would have carried very hot and highly flammable petroleum liquids. Shell's health and safety manager was quoted as saying "In my experience, Shell has sufficient safeguards, auditing procedures and assurances in place to avoid a situation where we have people out there doing unsafe acts." The same facility had had at least two other accidents in the previous two months, resulting in 14 injuries and 1 death.

* Shell is currently being sued by the National Environmental Law Center (NELC) on behalf of California PIRG for illegal discharges of selenium and cyanide into San Francisco Bay from its Martinez refinery. The company's own records show repeated and continuing violations of its water discharge permits for these highly toxic substances.

This is not an exhaustive list of Shell's history of severe and ongoing environmentally destructive actions. The DEIS notes that "certain measures that would avoid or reduce impacts have been included by SWEPI in the proposal. Such measures are considered design features of the proposal..." (p. 4-1). These measures should be seen by the BLM, the BIA and the public, we believe, in the light of Shell's proven poor environmental record. The DEIS does not appear to address this critically important

aspect of the proposal -- the trustworthiness of Shell's claims of environmentally protective operations -- and as such is deficient and inadequate.

This concludes our major comments on the DEIS. The DEIS likely has numerous additional flaws that contribute to its deficiency and inadequacy; time restrictions have limited us to the comments above.

In summary, because of the deficiency and inadequacy of the DEIS as noted above, we urge the BLM and BIA to reject the application for this exploratory well.

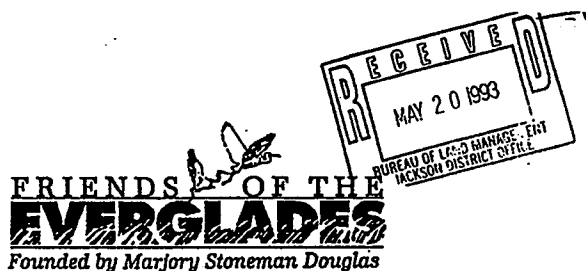
Pipeline Deal Role
Scheme to Spring Denby:
Small, Meese Says
A Tale of Intrigue, Luck
Memo on Iraqi Project, He Declares

Record \$1-Billion Cleanup
Ok'd for Colorado Arsenal

Prosecutors Win Edict
on Use of Confessions

Gift for Your Valentine
FROSTED CRISTAL
PERFUME BOTTLE
\$25.00
Our delicate "Thimbletop" perfume bottle will surely delight this lady who loves a special day. This frosted glass bottle and matching stopper has a handsome price tag of \$25.00.

O-54



101 Westward Drive, #2, Miami Springs, Florida 33166; Ph: (305) 888-1230

Mr. Robert V. Abbey
District Manager
Bureau of Land Management
411 Briarwood Drive, Suite 404
Jackson, Mississippi 39206

May 18, 1993

Dear Mr. Abbey,

On behalf of the Friends of the Everglades I write to highlight some of our remarks made at the April 14th public hearing concerning the Draft Environmental Impact Statement (DEIS) for the Proposed Miccosukee 3-1 Oil Well, Application for Permit to Drill (APD).

First let me say that Friends of the Everglades opposes the APD and the proposed project on the basis of policy issues concerning the future restoration of the Everglades, issues relative to land uses in a drinking water supply area, and issues dealing with groundwater protection. As leaders in the development of these policies in Florida and at a national level (specifically the "Sole Source" provisions of the Safe Drinking Water Act and wellhead protection), we have firm positions that preclude the risk to public health, welfare and safety that this project poses.

Secondly, the information, as brought out so far in the public hearing, contains enough data to convince us that there is no significant support for the conclusion that the project will have no harmful effects on the environment and the water resources of the region. On the contrary, our knowledge of the area's groundwater systems lead us to believe that the project will put in serious jeopardy the groundwater and surface water resources that serve the drinking water needs of the urban coastal cities and the biological integrity of the Everglades.

Specifically:

• The Grey Limestone Aquifer underlies the site and is hydraulically connected to, in part (and indistinguishable from, in other parts), the Biscayne Aquifer, an aquifer designated as a Sole Source by EPA. Leaks in the well, the site, and the accessory activities risk contamination in a way that may create a significant hazard to public health.

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O-55

30 • The EIS claims that water does not drain south and east of the proposed site, yet the photos and maps of the site show clearly that those are the precise destinations of the site's drainage water. Water Conservation Area #3 will receive both routine drainage and emergency overflows from the oil well site under this proposal. Emergencies such as hurricanes, blowouts, spills, floods, and fires can have serious impacts on the WCA #3 and downstream systems (such as Everglades National Park), including the primary recharge areas of the Biscayne Aquifer which are affected by direct recharge and seepage from WCA #3.

25 • The proposal and the DEIS ignores a world of activity presently engaged to restore the Everglades, and they ignore proposals to reflood many presently drained areas in the process. One such proposal, currently under consideration by the state, is a flow-way connecting Lake Okeechobee with the WCA #3. No discussion of this or of any other consequences of the Everglades Restoration has been included in the DEIS. If it was, you could only conclude that the well site was an obstacle to saving the Everglades.

26 85 13 • The DEIS is severely flawed and must be redone. A new draft with the resultant new review process is required to settle the many conflicts in content that were brought out at the public hearing. The current DEIS uses out-of-date maps, incomplete treatment of alternatives, and no discussion of cumulative impacts. This cannot serve the purposes of NEPA nor of the BLM in making a proper decision.

We have not heard yet from you as to our April 14th written request for an extension of the comment deadline and for a "Sole Source Review" by the U. S. Environmental Protection Agency. We expect that you have favorably received these requests, otherwise you would not have delayed in advising us until after the deadline. We would appreciate formal notice of this intention.

I wish to reaffirm, in closing, that Friends of the Everglades believes you will deny this project based on a proper body of information that only an accurate and complete EIS can provide. We also believe that the DEIS you now have fails to provide that information and will mislead you to a disastrous decision unless corrected. From what we know, Friends opposes the project and urges a denial of the Application for Permission to Drill.

Sincerely,

Joe Podgor
Executive Director

NOTE: Petitions filed
in "miscellaneous" folder.
SR

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GREENPEACE

Greenpeace • 1436 U Street NW • Washington DC 20009 • Tel (202) 462-1177
Tlx 89-2359 • Fax (202) 462-4507

May 28, 1993

Robert V. Abbey
District Manager
Bureau of Land Management
411 Briarwood Drive, Suite 404
Jackson, Mississippi 39206

Dear Mr. Abbey,

As per our telephone conversation of the other day, enclosed please find the final page 15 of the DEIS Comments that was somehow omitted from the Greenpeace Comments submitted on May 18, 1993 for the Proposed Shell 3-1 Well. It is my understanding that you will incorporate page 15 into our document.

I would appreciate it if you would also incorporate the attached revised page 13 with our comments also. We wanted our comments on NORM to address both drilling and production, and I was not certain that this was clear in the original page 13 that we submitted.

Thank you for your consideration of these matters. I regret any inconvenience this may cause you. If you have any questions, please give me a call.

Sincerely,

Joette Lorion
Greenpeace Advisor
7269 Sw 54 Avenue
Miami, Florida 33143
(305) 661-2165

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AIRMAIL

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May 18, 1993

Robert V. Abbey
District Manager
Bureau of Land Management
411 Briarwood Drive, Suite 404
Jackson, Mississippi 39206

VIA FAX and U.S. Express Mail Service

Dear Mr. Abbey,

Greenpeace submits the enclosed comments on the Draft Environmental Impact Statement (DEIS) dated March 8, 1993, for the proposed Shell Western E&P Inc., Miccosukee 3-1 Exploratory Well.

As per our conversation last week in which you informed me that a postmark of May 18, 1993 is sufficient for timely filing of these comments, I am sending the original copy of our comment by U.S. Mail Express Mail Service. However, I am also faxing a copy of these comments to your office on this date.

Attached to our comments are petitions with the signatures of approximately 3,500 people who are opposed to the drilling proposal.

Thank you for your consideration of these issues so important to South Florida and the nation.

Sincerely,

Joette Lorion
Greenpeace Advisor
7269 Sw 54 Avenue
Miami, Florida 33143
(305) 661-2165

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P. 02

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GREENPEACE COMMENTS

ON THE DRAFT ENVIRONMENTAL IMPACT STATEMENT
SHELL WESTERN E&P INC.
MICCOSUKEE 3-1 EXPLORATORY WELL
MICCOSUKEE INDIAN RESERVATION, BROWARD COUNTY, FLORIDA

Submitted to the Bureau of Land Management and the
Bureau of Indian Affairs

May 17, 1993

"There are no other Everglades in the world. They are, they have
always been, one of the unique regions of the earth; remote never
wholly known. Nothing anywhere else is like them..."

Marjory Stoneman Douglas, *River of Grass*

AIRMAX

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P. 03

GREENPEACE COMMENTS PURSUANT TO THE LETTER BY ROBERT V. ABBEY DATED MARCH 8, 1993 ON THE DRAFT ENVIRONMENTAL IMPACT STATEMENT

Greenpeace submits the following comments to the Draft
Environmental Impact Statement, Shell Western E&P Inc. (SWEPI),
Miccosukee 3-1 Exploratory Well, Miccosukee Indian Reservation,
Broward County, Florida dated March 8, 1993.

In summary, it is Greenpeace's position that the Draft
Environmental Impact Statement does not comply with the purpose or
intent of National Environmental Policy Act of 1969 (NEPA) in the
manner we describe below, and does not provide sufficient
scientific documentation to support the opinion of the Bureau of
Land Management (BLM), in consultation with Bureau of Indian
Affairs (BIA), that "the analysis presented in the DEIS shows that
the proposed action will "assure protection of natural resources,
environmental quality, life and property." (p. S-12).

I. INTRODUCTION

On March 8, 1993, the Bureau of Land Management (BLM) and the
Bureau of Indian Affairs (BIA) issued a Draft Environmental Impact
Statement (DEIS) that purportedly analyzes the environmental
impacts of the Shell Western E&P Inc. (SWEPI) proposal to drill an
exploratory well to test the oil and gas formations at a site
located on the Miccosukee Indian Reservation located in Broward
County Florida, approximately 40 miles west of the City of Fort
Lauderdale. The DEIS states on page 1-11 that the Miccosukee Tribe
is in support of the plan "provided that it meets applicable
environmental regulations."

During the public scoping process on the proposed project
substantial public concern was raised due to the sensitivity of the
Everglades and the proximity to the Water Conservation Area 3 and
the Biscayne Aquifer. After the public hearings, the Bureau of
Land Management announced that they would expand their analysis
from an Environmental Assessment to an Environmental Impact
Statement. It is Greenpeace's position that the proposed drilling
project is a major federal action that could significantly affect
the quality of the human environment and requires that an
Environmental Impact Statement (EIS) be prepared under the National
Environmental Policy Act (NEPA).

Whether one agrees with the BLM that an EIS was prepared
merely to "assure the public that the potential environmental
impacts of the proposal would be thoroughly analyzed and addressed"
or the Greenpeace position that an EIS is required under federal
law, the DEIS was prepared and it is this DEIS on which the
following comments are based.

II. The DEIS DOES NOT MEET THE PURPOSE OR REQUIREMENTS OF NEPA The National Environmental Policy Act of 1969 (NEPA) requires

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that an Environmental Impact Statement be prepared for a major
federal action significantly affecting the quality of the human
environment. One of the defined purposes of NEPA is to "promote
efforts which will prevent or eliminate damage to the environment
and biosphere and stimulate the health and welfare of man."
(Emphasis supplied). The EIS must contain a detailed statement by
the responsible federal official on:

- (i) The environmental impact of the proposed action;
- (ii) Any adverse environmental effects which cannot be
avoided should the proposal be implemented;
- (iii) Alternatives to the proposed action;
- (iv) The relationship between local short term uses of man's
environment and the maintenance and enhancement of long term
productivity;
- (v) Any irreversible and irretrievable commitments of
resources which would be involved in the proposed action should it
be implemented.

The DEIS issued on the proposal is fundamentally flawed and
incomplete in the following ways:

A. THE SCOPE OF THE DEIS IS DEFICIENT

The DEIS is fundamentally flawed in that it only analyzes
environmental impacts associated with drilling and does not address
potential environmental impacts associated with oil or gas
production and field development. It is unclear how the BLM can in
good faith attempt to separate components or increments of a
program that are independent and interrelated. Despite the
statement on page 1-6 that production and field development are not
connected to the proposed drilling actions, it is clear from other
statements in the DEIS that the BLM is aware of that development of
the oil or gas is the purpose of the lease.

For instance, page 1-10 of the DEIS contains the following:
"The lease is a legal contract that grants the exclusive right to
SWEPI to explore for, drill, and develop all hydrocarbons from the
70,359 acre lease area. The leasing decision and leasing action
represent a commitment to allow exploration and development of
potential hydrocarbon resources on the property. Hence drilling
activity on the leased acreage constitutes a valid contract right
and is required in order to fulfill the purpose and intent of the
lease." (Emphasis supplied).

Section 1500.8 (a) (3) (ii) of the Council on Environmental
Quality Guidelines on Implementing NEPA requires that secondary or
indirect, as well as primary or direct consequences for the
environment, should be included in the content of an EIS. It is
sophistry for our government officials to contend oil production
and field development, which could produce secondary or indirect
environmental consequences, are not connected to drilling, and that

they are also not "proposed or reasonably foreseeable and are not
subject to review in the DEIS (DEIS S-5)."

The Council on Environmental Quality (CEQ) Implementing
Regulation 1508.25 defines "scope" so as to require consideration
in a single statement of actions that, to oversimplify, are
connected, cumulative, or similar. For instance, Section 1508.25
(a) (1) (iii) says that actions are connected if they: (1)
Automatically trigger other actions which may require environmental
impact statements; (ii) Cannot or will not proceed unless other
actions are taken previously or simultaneously; or (3) Are
interdependent parts of a larger action and depend on this larger
action for their justification.

Clearly, the actions are connected because oil production
could not proceed in lieu of drilling and the drilling would not
take place if oil production in the area was not a possibility.
Also, the DEIS itself states that a decision to produce would
trigger another environmental analysis. Finally, there are
humorous places in the DEIS that address both drilling and
production, such as pages 1-7, 1-13, 2-14 and 4-59.

It is clear that under NEPA Section 102 (2) (C) (iv), which
requires a discussion of the relationship between local and long
term uses of man's environment, and Section 101 (b) (1), which
makes it the responsibility of the Federal government to act as a
trustee of the environment for future generations, the decision of
BLM officials to only address drilling, and not production, is
unreasonable and insufficient. It is imperative to the protection
of the environment that this agency make a reasonable effort to
discern what the effects of production and field development will
be, especially in light of their inability to show that such
projections are impossible.

It is our concern that by attempting to break the program
(drilling and production) down into component parts, the agency may
be trying to avoid addressing secondary or indirect consequences
that could "significantly" affect the environment. Additionally,
using the "drilling only" concept, the agency attempts to limit its
discussion of alternatives, such as conservation and renewable
energy, to the proposed action. These alternatives, which could
obviate the need for drilling and subsequent production of oil or
gas, should properly be addressed in the preliminary stages of the
project before activities have reached a stage of investment or
commitment to implementation likely to restrict alternatives at a
later stage.

We will not allow the narrow scope of the DEIS to dictate our
comments. Our remaining comments will address both the potential
environmental consequences of drilling and production, just as the
DEIS has when it appeared to serve the purpose of BLM to do so.

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B. THE DEIS FAILS TO ADEQUATELY ANALYZE ALTERNATIVES TO THE PROPOSED ACTION THAT COULD OBVIATE THE NEED FOR THE PROJECT

In light of the fact that a proper consideration of alternatives may obviate the need for drilling and render the other issues moot, we now turn our attention to the subject of alternatives to the proposed action. The DEIS as it relates to a proper consideration and analysis of energy alternatives is grossly inadequate in that any discussion of alternatives is severely limited and in some cases, as in the case of conservation and renewable energy, an analysis is non-existent.

The only alternatives fully considered and analyzed in the DEIS are drilling alternatives, and the No Action alternative is briefly addressed. In the brief discussion of their supposed consideration, but not analysis, of the issue of whether the project could be eliminated through energy conservation, the DEIS states that this alternative is not considered practical or feasible for several reasons, especially because the BLM and BIA do not have any means or authorization to require use of alternate energy sources as an alternative to the proposal. (DEIS S-4).

Section 4332 (2) (C) of NEPA requires that the DEIS prepared by the agency thoroughly explore and discuss alternatives to the proposed action. The BLM position that the only alternatives they are required to discuss under NEPA are those that can be put into effect by them frustrates the intent of NEPA. Clearly, the BLM can call upon other agencies with expertise in the areas of energy conservation and alternatives to assist them in addressing and analyzing reasonable alternatives to the proposed action regardless of whether they fall in the jurisdiction of their agency. For instance Section 102 (2) (A) of NEPA requires agencies to use a systematic, interdisciplinary approach to their decision making. (Emphasis supplied).

At the public hearing on the DEIS, Greenpeace raised a number of reasonable and available alternatives that should be fully discussed, and the environmental consequences of implementing each analyzed, before the proposal is accepted. Failure to address the issue of reasonable and available alternatives now before the drilling begins would thwart the purpose of NEPA in that substantial investments will have been made and options will have been precluded if this issue is evaluated at a later date.

Some of the alternatives that should be explored include obviating the need for this oil through energy conservation and/or the use of renewable energy, such as solar. Evidence that this could be done includes the following:

REBUILDING FOR EFFICIENCY. Florida Solar Energy Center, FSEC-CR-562-92, December 1992 - This report, which was conducted after Hurricane Andrew, is an assessment of potential energy efficiency

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improvements for both new and existing homes in Florida. The report estimates that through the use of an identifiable package of efficiency measures used in new construction, it was estimated to potentially reduce electricity consumption in rebuilt homes by 39% or 5,350 kWh and that summer utility coincident peak loads were predicted to drop by 1.5 kW-about 37% lower than conventional new homes. (Exhibit A).

INVESTIGATION OF AIR DISTRIBUTION LEAKAGE AND ITS IMPACTS IN CENTRAL FLORIDA HOMES. Florida Solar Energy Center, FSEC-CR-397-91, January 31, 1991. This report estimates that if leaks in air conditioning ducts in a home are plugged, air conditioning use can decrease by as much as 17.2%, yielding an estimated savings of \$110 a year. The report further estimates that the repair of 3 million Florida homes could reduce winter peak demand by 5,000 megawatts, or 13% of the state's generating capacity. (Exhibit B).

ELECTRICITY CONSERVATION AND ENERGY EFFICIENCY IN FLORIDA. TECHNICAL ECONOMIC AND ACHIEVABLE RESULTS. Draft Report, Florida Energy Office, January 15, 1993 - This draft report estimates that the technical potential for capacity impacts through efficiency and conservation measures indicate that 10,522 MW could be reduced by the year 2,000. The report indicates that the greatest potential for energy savings is in residential and commercial air conditioning systems and commercial lighting. (Exhibit C).

AMERICA'S ENERGY CHOICES. Investing in a Strong Economy and a Clean Environment. by Union of Concerned Scientists, 1991 - This report estimates that through the use of energy efficiency and renewable energy we can reduce the nation's petroleum consumption by one-third by the year 2030; cut CO2 emissions by 70% by the year 2030; and save a net 2.3 trillion dollars. Additionally, the report notes that the Department of Energy summary of the public hearings they conducted across the country in 1991 states, "The loudest single message was to increase energy efficiency in every sector of energy use. Energy efficiency was seen as a way to reduce dependence on imports, and reduce the cost of energy." (Exhibit D).

ENERGY FOR EMPLOYMENT. How to Heat Up the Economy, Not the Planet. Greenpeace, July 1992 - This report demonstrates that clean energy industries are far more productive employers than the fossil fuel industries and cost less than traditional energy sources. The report also points out that one reason for failure of the market to lead to efficient and clean energy use is because the external costs of energy are not factored in at present. The report recommends that fossil fuel extraction should be billed to account for the cost to society of its global warming and other polluting emissions (page 27). (Exhibit E).

CLINTON/GORE ON NATIONAL ENERGY POLICY. 1992 campaign document - This document from the Clinton/Gore campaign states that if elected Clinton/Gore would strengthen federal programs to encourage energy

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efficiency and that this could cut domestic energy consumption by 25% using measures that would pay for themselves in 5-7 years. (Exhibit F).

It is clear from the above that the use of reasonable and available alternative energy technologies, both in Florida and the United States, could easily replace the small amount of oil that might be produced from the proposed project at a lower cost and a lesser threat to the environment. Thus, the BLM under NEPA has a duty to investigate these issues further. Such an analysis might include working with other agencies to perform a cost benefit analysis of alternatives, or, moreover, since this appears to involve national energy implications, the impact statement could be assigned to a group designated by the President that analyzes overall energy questions for the executive branch. For while the BLM does not, according to the DEIS, have the power to require the use of alternative energy sources, encouraging such use is in the purview of both Congress and the President. The statement on page 4-59 of the DEIS concerning objectives of federal programs appears to suggest that the BLM is not adverse to looking at these issues from a national perspective.

Finally, in assessing the No Action alternative, the BLM states on page 4-59 of the DEIS that a potential negative economic impact would be felt on the Miccosukee Indian tribe because they would not realize potential revenue from development of the oil and gas lease and jobs would not be realized. It is interesting to note that on page 4-22 of the DEIS it states that construction of the drill site exploratory well requires skilled workers that may not be found among the Miccosukee Tribe, and that only a few non-skilled temporary jobs may be realized by the proposed project. Perhaps the BLM should conduct an analysis of the jobs and economic benefits to the Miccosukee that could result if the federal government developed an environmentally appropriate clean energy project on the Miccosukee reservation that would provide jobs, stimulate the local economy, and not threaten the environment of the Miccosukee or others.

C. THE DEIS CONTAINS AREAS OF SPECIFIC CONCERN THAT ARE INADEQUATELY ADDRESSED AND/OR ANALYZED

1. The Analysis and Documentation in the DEIS Does Not Adequately Support the Conclusion That "No Significant Impact to Water Resources Is Expected"

As the DEIS correctly points out, there are important potable groundwater sources, such as the Biscayne Aquifer, and sensitive surface water bodies, such as Water Conservation Area 3A in the area of the proposed project. Indeed, the plan is to drill under WCA 3A even though environmental concerns appear to have prevented the drilling from the surface of WCA 3A. Additionally, the Biscayne Aquifer, which had been designated by the Environmental

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Protection Agency (EPA) as the "sole source" of drinking water for four million people, is adjacent to the drilling site. Finally, the gray limestone aquifer, which Appendix A-6 says is the only major source of fresh groundwater in the area of the Miccosukee Reservation, is in the project vicinity.

It is unclear whether the documents attached in Appendix A-6 are included as scientific support for the BLM position. The Preliminary Analysis of the Hydrologic and Geologic Characteristic of the Miccosukee Indian Reservation dated January 1991 attached therein contains a statement on page 16 that, "Under no circumstances would an oil spill within the North part of the Miccosukee Indian Reservation affect any of the major drinking water supplies along the southeast coast."

The report does not appear to contain any independent scientific analysis to support this statement. In fact, the author states on page 22 of the report that the scope of his work "included researching literature and files of government agencies to gather information on the geology and hydrology of the reservation and adjacent areas." Indeed, attached to his report is an impressive bibliography of documents from 1944 through 1990 but there does not appear to have been any independent scientific field data gathering or computer models performed for the area.

The only computer simulation models that are included in the DEIS appear to be by Dames & Moore, Inc., the third party consultants, and are attached as Appendices A-7 and A-8. On page 2 of the Groundwater Brine Spill Simulations document attached as Appendix A-7, a statement about the model informs us that, "A lack of detailed site specific data required the estimation of most parameters." (Emphasis supplied). On Page 2 of Appendix A-8, the Groundwater Oil Spill Simulations document, it discusses the data input for the model and states, "Values for these properties were obtained by conducting a literature and data search on information pertaining to the local conditions and by relating local conditions to information obtained elsewhere."

Clearly, it is the lack of site specific field data that should be at issue here. Statements in the DEIS that the Biscayne Aquifer is "5-10 miles away" from the drilling site (while others say it is 3) are indicative of the lack of site specific field data that should be collected and used in a proper scientific analysis of the threat to the Biscayne Aquifer, our sole source of drinking water, and other water resources. Why have no scientific field studies been performed to determine exactly how close the Biscayne Aquifer is to the site? Why wasn't site specific information gathered and plugged into computer models before the DEIS was completed? Why have no probabilistic risk assessments been performed of the worst case potential risk to the water supply that may be posed by this proposed project performed and contained in the DEIS? Are literature searches and "guesstimating" the proper

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way to protect our precious water resources?

NEPA also requires that the relationship between local short term uses of man's environment and the maintenance and enhancement of long term productivity be address and analyzed. It is clear that a scientific analysis based on current data should be performed to assess the possibility and probability that the drilling and production of oil at this site could be a short term use that could threaten the Biscayne Aquifer, a potable drinking water source for four million people, and the gray limestone aquifer, the only major fresh groundwater source for the Miccosukee Reservation.

Also, it is imperative that the BLM immediately provide the U.S. Environmental Protection Agency with all available data concerning this issue so that they can perform a "sole source" review of the environmental effects that this project could have on the Biscayne Aquifer. Section 1424 (e) of the Federal Safe Drinking Water Act provides for such review since that the project could significantly impact hydrologically connected groundwater and surface water systems and could pose a significant hazard to public health.

Finally, the DEIS has not adequately addressed or analyzed how produced waters, drilling muds, cuttings and other wastes carrying contaminants including heavy metals, such as mercury, and radium, a radioactive isotope, might impact our ground and surface water systems and further contaminate the Everglades and Everglades National Park. Florida is currently performing studies on the mercury contamination problem in the Everglades and the threat it poses to public health. In light of this public health threat, it is imperative that the BLM to analyze how the project might increase the extent of Florida's mercury problem.

2. The DEIS Does Not Adequately Analyze The Direct, Indirect and Cumulative Impacts that the Project May Have On Endangered and Threatened Species and Wildlife

As is the case concerning the environmental impact on water resources, the only supporting documents attached to the DEIS, except for letters from a few agencies that contain no documentation, appear to be the work of a consultant. Again, it is not clear whether the attached documents were those used to support BLM's assertion page S-11 of the DEIS that "significant direct impacts to wildlife in general are not anticipated for the proposed action and alternatives."

The Federal Endangered Species Act of 1973 (ESA) obligates federal agencies to ensure that any actions that they permit do not jeopardize the continued existence of any endangered species or modify their critical habitat. (42 U.S.C. 1536 (a) (2)). According to the DEIS page 1-15, the U.S. Fish and Wildlife Service defines

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jeopardize as follows:

"To engage in any activity or program which reasonably would be expected to reduce the reproduction, number or distribution of a listed species to such an extent as to appreciably reduce the likelihood of survival and recovery of the species in the wild." (50 CFR 420.02).

Certainly in the case of the endangered Florida panther, of which only 30-50 remain, the loss of even one panther would be significant. It is interesting to note that on page 3-55 of the DEIS it recounts that the Biological Assessment attached to the 1981 Environmental Assessment addressing the impacts for hydrocarbon development on the entire Miccosukee Indian reservation contained a determination of "may affect" for the Florida panther. Also, on page 4-55 of the DEIS it states that, "The potential for collision related mortality resulting from increasing traffic along the access route would increase slightly during construction and drilling operations." The BLM should be reminded that no increase in mortality is slight when only 30-50 of a species remain.

Although the Biological Assessment was not attached to the DEIS, a Wildlife Evaluation prepared by a private consultant for Shell in 1990 was attached as Appendix A-9. This wildlife evaluation of the site indicates that there is panther activity in the vicinity of the site and states that a male panther currently utilizes the Snake Road area, and a female panther visits that area occasionally. In fact, page 9 of the report states that "the project vicinity is within the range of panther activity." Additionally, the statements in a Dames & Moore memo attached to Appendix A-12 from Jackie Moore to Mike Nagy dated June 8, 1992 indicate that a record check indicated that, "Two Florida panthers were reported in the vicinity."

Curiously, these reports do not appear to support the statement on page 3-69 of the DEIS that "Panthers are not known in the area of the proposed action, according to available literature and conversations with D. Maehr (1992)." In light of the above, it is imperative that the DEIS address and analyze the effects that the project may have on the Florida panther, including the issue of whether disturbing this habitat may interfere with any potential reproduction activity of the male and female panther, and any other threat that the project may pose to the likelihood of survival and recovery of these few remaining endangered panther that exist only in South Florida.

As for wildlife in general, the Wildlife Evaluation in Appendix A-9 states that "the project site and its immediate vicinity could not be considered a critical habitat for this or any other protected species." Yet, neither the Wildlife Evaluation nor the DEIS addresses the possibility that drilling or production may cause secondary or cumulative impacts to endangered or threatened

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species in the area. Nor does it address how pollutants or contaminants from spills and/or drilling, production or field development might affect the Bald Eagle, Florida Sandhill Crane, Wood Stork and wading birds that feed in the canals and drainage ditches in the project vicinity. For instance, could mercury be made available during the drilling process that could endanger the birds, panther, and other wildlife through bioaccumulation.

Additionally, there was no thorough discussion or analysis of how spills might affect reproduction of birds and other endangered or threatened species, nor was there an analysis of potential mortality rates that might result from spills or accidents. There was no discussion of biomagnification of hydrocarbons or other contaminants that might endanger wildlife as a result of drilling or production wastes. Nor was there a site specific analysis of how the noise from drills may stress the birds, panther, and other wildlife and displace them from their habitat or interfere with reproduction except to reference the Big Cypress Management Plan which contains a quote on page say on page 4-19 that states "The effects of oil drilling noise on wildlife populations is not well documented in the literature."

3. The DEIS did not Adequately Address the Environmental Threat That the Generated Wastes Pose to the Water Resources, Wildlife and the Environment

On page 4-31 of the DEIS, it states that the wastes generated will include contaminated storm water, drilling muds, solid wastes and sewage. On page 4-37 of the DEIS it states that, "Lack of containment and improper handling of generated wastes could possibly result in contamination of the soil, surface and groundwater in the immediate vicinity of the proposed drill site."

According to a Greenpeace Report entitled, Oil In Arctic Waters: The Untold Story of Offshore Drilling in Alaska, January 1993, the mud and rock cuttings created by the drilling process can contain toxic substances such as cadmium, copper, arsenic, lead and mercury. Produced waters can carry radioactive radium to the earth's surface. It is also unclear how these wastes will be regulated, since it appears that according to the DEIS on page 1-17 drilling wastes are excluded as hazardous waste. And, how will the federal government monitor the drilling fluids, which according to the DEIS on page 2-14 will be analyzed by Shell for toxic and radioactive fluids?

As stated previously, the Florida Everglades has a serious mercury contamination problem. The BLM has not performed studies on what effect the drilling and production could have on exacerbating this problem. Nor has the BLM addressed the issue of whether a hurricane could spread the hazardous and radioactive substances that are produced by the drilling process.

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As for the radioactive material, page 4-35 of the DEIS states that Naturally Occurring Radioactive Material (NORM) in the form of radium and thorium may be contained in the produced waters from drilling. In the discussion of NORM, it states that the Bureau of Geology analyzed produced water from three other South Florida oil fields and determined that NORM is an insignificant problem from water for levels of radioactive material is not sufficient to protect the wildlife or human health since it does not accurately assess the manner and level in which radioactive material can bioaccumulate in living things.

Dr. Gordon Edwards is a Canadian who has conducted research on uranium miners and lung cancer. In one of his reports, NUCLEAR WASTES-What We Worry?, Dr. Edwards states on page 15 that "Radium-226 is considered to be one of the most toxic radioactive substances known to man. When ingested through food or water, it is considerably more dangerous than either strontium-90 or plutonium-239. It accumulates in the bones, where it can cause bone cancer and other disorders, including leukemia. Chronic radium concentration may eventually prove to be an even more serious problem than mercury pollution is now."

Dr. Edwards goes on to explain that when dispersed into the environment, radium (like mercury and DDT) is concentrated by biological organisms. He says that river algae will typically show radium concentrations from 500 to 1,000 times higher than contaminations in the river itself and crops irrigated with contaminated water will often concentrate radium by a factor of 100 or more.

Other reports, including a British Columbia Medical Association Report entitled, The Health Dangers of Uranium Mining, August 1980, demonstrate that fish and wildlife can also concentrate radiation to alarming degrees. For instance on page 94 of the report it contains comments from a study on oceanic organisms that show that some marine micro-organisms can concentrate Radium-226 from 1,000 - 3,000 times sea water level. The report also demonstrates that Radium-226 decays to Radon-222, a gas which in turn produces radon daughters, all effective at causing lung cancer. The DEIS makes no mention of the potential health hazard that radon gas or radon daughters might pose to human health if NORM are produced in the drilling process.

Radium-226, which has a half-life of 1620 years, is continually replenished by thorium-230, which has a half-life of 86,000 years. Radium-226 also produces radon gas and radon daughters. Thus, once introduced to the environment these substances will be around for a very long time and their long term environmental dose commitment should be analyzed. While it may be true as it states in the DEIS that radium and thorium are "naturally occurring" materials, it is also true that most of it is

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contained deep underground, where it is relatively harmless, since most of it disintegrates long before it escapes from the rock formations in which it is trapped.

Since the drilling/production process could make long-lived radioactive materials available to the living environment, the BLM must conduct an analysis of whether the introduction of these materials into the environment through the drilling and production process poses a threat to the people and the wildlife that may be exposed to them. Since effects of radiation are cumulative, this is especially important in Florida where background radiation levels are high. Finally, in light of the statement in the DEIS that radioactive materials will build up in the pipes of the equipment, the BLM should address whether the equipment will be disposed of as nuclear waste at the completion of the project.

Other issues of concern regarding the wastes include the danger that a transportation accident carrying hazardous waste might occur and cause toxics to enter the environment. Finally, how will the BLM ensure that hazardous wastes will not be deposited in the wetlands?

4. The DEIS Does Not Adequately Analyze the Effect that the Project May Have On Wetlands

The DEIS has determined that "significant wetland impacts resulting from the proposed action and alternatives are not expected to occur." Apparently, they have not determined that they will not occur, only that they are not expected to occur.

The DEIS glossed over how this proposal was affected by the Federal Executive Orders 11990 and 11988 that govern wetlands and floodplains. We believe that a serious analysis of this issue must be conducted and included in the DEIS if the public welfare and wetlands are to be protected. This should include an analysis of the effect that discovering oil at this site might have on encouraging more building and drilling in the Everglades ecosystem.

5. The DEIS Does Not Adequately Address or Analyze the Potential Socioeconomic Impacts of the Project

The DEIS states that "No significant negative socioeconomic impact would result from the proposed action and alternative." The DEIS does not attempt to address or analyze any negative socioeconomic impacts to tourism that might occur as a result of an oil spill or other hazardous wastes contaminating a portion of the Everglades and its wildlife or the water supply. Nor, does the DEIS perform a probabilistic risk assessment to prove that such a catastrophic event could not happen. Since tourism is an important industry for both Dade and Broward County, the DEIS should attempt to analyze what effect in terms of dollars and jobs lost that a catastrophic spill, one that might contaminate the Biscayne

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66 | Aquifer, could have on Dade and Broward counties.

Also, the DEIS should analyze the potential negative socioeconomic effects that could occur to the Miccosukee Indian Tribe as a result of a spill and/or contamination of their land and water, including any contamination of the gray limestone aquifer, which according to Appendix A-6 (page 40) in the DEIS is the primary source of fresh groundwater for the Miccosukee Reservation, and loss of tourism dollars that might result from contamination of the water supply or the Everglades.

For instance a report entitled Economic Recovery Strategies by the Economic Development Association, 1993, states on page 21 that, "Tourism is Dade County's number one industry, employing a third of its work force (270,000+) and generating more than seven billion dollars each year. In 1991, visitors to greater Miami and the Beaches paid 37% of all Dade County's state sales taxes (\$404 million)- dollars that help pay to educate our children, support our criminal justice system, etc."

6. The DEIS Does Not Contain Sufficient Information For The Public To Assess The Degree of Federal Accountability In Its Preparation

On page 5-1 of the DEIS, it states that the, "SWEPI Miccosukee 3-1 DEIS was prepared by Dames & Moore, Inc, a third party consultant, with the BLM Jackson District acting as the lead agency and the BIA Eastern Office, the joint lead agency." The report does not appear to contain information discussed at the public hearing, which concerned some people who testified, that although the BLM and BIA are the lead agencies on the DEIS and supervised the work, the third party consultant was paid by Shell.

Section 102 (2) (C) of NEPA requires that the impact statement be prepared by the "responsible federal official." A look at the list of the people who prepared the DEIS shows that the public officials who are listed as preparers of the DEIS are far outnumbered by what appear to be consultants. Indeed, Robert V. Abbey, Bureau of Land Management, and B. D. Ott, Bureau of Indian Affairs, who are listed as the responsible public officials on the report do not appear on the list of principal preparers of the DEIS, although their subordinates do.

Because it is unclear as to the degree of delegation that was given on the DEIS to third party consultants by the federal government, it raises questions as to whether the DEIS meets NEPA's most basic purpose of providing federal accountability for the environment. We request that the BLM and BIA more fully explain the extent and manner of their involvement in both the gathering and analysis of data, and the preparation of the DEIS itself. This should include an explanation of how the responsible federal agency conducted its own independent evaluation of the information

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supplied by the consultants, and in what manner and to what extent they performed an independent and critical evaluation of the environmental considerations.

Also, since some members of the public raised concerns at the hearing about the DEIS due to the third party consulting arrangement, the BLM may wish to provide information in the DEIS on the financial compensation that the third party consultant received for the preparation of the DEIS, the tasks that were assigned to the consultant, and the nature and scope of participation that the BLM had in the preparation and supervision of the DEIS work.

III. CONCLUSION

As demonstrated in the foregoing comments, the Draft Environmental Impact Statement regarding the Shell Western drilling application is inadequate, fundamentally flawed, and does not meet the requirements of the National Environmental Policy Act of 1969 (NEPA). There is a plethora of cases that demonstrate that NEPA's mandate to protect and preserve the environment has been given strict enforcement in the courts with frequent admonitions that it is insufficient to give mere lip service to the statute and then proceed in blissful disregard of its requirements.

The DEIS issued by BLM on this project appears to be long on conclusions and lip service and short on scientific analysis and studies to support these conclusions. It also fails to discuss and analyze important environmental issues that are required under NEPA. Therefore, it is imperative that the BLM prepare a new Draft Environmental Impact Statement that complies with the requirements of NEPA and addresses and analyzes the issues that concerned environmentalists and members of the community have brought forward. After the new DEIS is prepared, public hearings should again be held and comments solicited before the Final Environmental Impact Statement is issued.

At risk in this case is the potential loss or degradation of a "one of a kind" world class resource, the Everglades, and the sole source of drinking water for four million people, The Biscayne Aquifer. Any project proposed that has the potential of impacting these and other significant resources demands the attention and scrutiny, not only of the Department of the Interior, but the Environmental Protection Agency and the President, as well.

To close on an editorial note, it is regrettable that we continue to look to environmentally sensitive areas like Florida's Everglades for energy that can be provided through clean energy initiatives at a lower cost, both economically and environmentally. The Sunshine state should be tapping the sun for energy instead of stripping fossil fuel from the precious Everglades that when burned could contribute to global warming and further threaten Florida's

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fragile and unique environment.

In short, energy efficiency and renewables are the dollars and sense solutions to drilling for oil in the Everglades. Alternatives can provide the heat, light, and mobility that we need, while safeguarding our fragile Florida environment and precious Everglades. For as Marjory Stoneman Douglas so beautifully put it, "There are no other Everglades in the world. They are, they have always been, one of the unique regions of the earth; remote never wholly known. Nothing anywhere else is like them..."

Prepared by: Joette Lorian, Greenpeace Advisor, 7269 SW 54 Avenue, Miami, Florida 33143. Phone: (305) 661-2165.

* Attached to the comments are petitions with approximately 3,500 signatures against the Shell drilling proposal that were collected by Greenpeace in Dade and Broward County.

cc Bruce Babbitt, Secretary of the Interior
Carol Browner, Secretary of the Environmental Protection Agency

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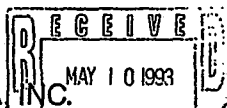
HELP
OUR
FUND

Reply to:
Winifred Reuter, Director
365 Hamilton Avenue
Safety Harbor, FL 34695
Phone: 813-726-4284

HUMANITARIANS OF FLORIDA, INC.

An Inter-County Non-Profit Humane Organization

2821 E. Nimrod Street
Ft. Lauderdale, Florida 32636
Telephone: (904) 726-2262



BUREAU OF LAND MANAGEMENT
U.S. DEPARTMENT OF THE INTERIOR

OUR MAJOR GOALS
Spay-Neuter
Humane Education
Help for Wildlife

Robert V. Abbey, District Manager
BLM, 411 Briarwood Drive, Suite 404
Jackson, MS 39206

Dear Mr. Abbey:

This letter is written with regard to Shell Oil's plans to drill in the Everglades. One of the most delicate parts of our state's natural environment would be severely threatened, it could well be catastrophic. We are deeply concerned over this. The state of Florida definitely does not want Shell Oil drilling in any part of our Everglades. No oil drilling, please!

cc: The Hon. Connie Mack
The Hon. Bob Graham

Sincerely,
Winifred Reuter
and members



All Dues and Contributions Tax Deductible

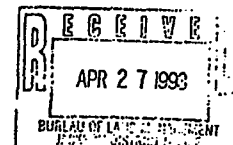


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540 Beverly Court, Tallahassee, FL 32301 (904) 224-2545 Kay Allen, President
April 23, 1993

Mr. Robert V. Abbey
District Manager
Bureau of Land Management
411 Briarwood Drive Suite 404
Jackson, Mississippi 39206



Dear Mr. Abbey:

The League of Women Voters of Florida and its members throughout Florida are alarmed that the Bureau of Land Management is seriously considering Shell Oil Company's application to drill for oil in the Everglades.

The Everglades is a national treasure; a unique fragile ecosystem upon which life in South Florida depends. Four million people depend on the Everglades and the Biscayne Aquifer for their water; and that aquifer is located perilously close to the proposed drilling site according to updated maps.

It is difficult to understand why the Federal government, which is mandated to protect the Everglades, would consider policy which risks destroying it. The Federal government sued the State of Florida because the Everglades was not being properly cared for. And now, a Federal agency seeks to impose more stress and grave potential danger on this seriously threatened land - to what benefit- perhaps a few days of oil. Where is the policy we were promised to promote alternative energy sources and to reduce dependence on fossil fuels? Is the answer to drill for oil in our most fragile ecosystem?

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Not only does the League of Women Voters of Florida consider drilling for oil in the Everglades bad policy; but we concur with other organizations who have evaluated the Environmental Impact Study and have concluded that the maps are woefully out of date and many of the conclusions drawn are erroneous.

Let us not open the door to commercialization and exploitation of the Everglades. We have a mammoth task ahead of us to protect what's left of the Everglades and to restore the Everglades so it will continue its functions of moderating our climate, supporting

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540 Beverly Court, Tallahassee, FL 32301 (904) 224-2545 Kay Allen, President

Page 2 Mr. Abbey, Bur. Land Management

wildlife, providing ample water for South Florida, feeding estuaries to support fish nurseries, and nourishing our fishing and tourist industries.

You have a decision to make of considerable import. We hope you will take the courageous stand of denying permits for oil drilling in the Everglades.

Sincerely,

Kay Allen

Kay Allen
President
League of Women Voters
of Florida
540 Beverly Court
Tallahassee, FL 32301

Stephanie Pearson

Stephanie Pearson, Director
of Natural Resources
League of Women Voters of
Florida
11356 NW 3rd Place
Coral Springs, FL 33071

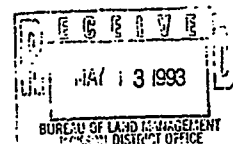
O-77



LEAGUE OF WOMEN VOTERS OF MONROE COUNTY
Rt. 1 Box 500-L, Big Pine Key, FL 33543

May 7th, 1993

Mr. Robert V. Abbey
District Manager
Bureau of Land Management
411 Briarwood Drive
Jackson, Mississippi 39206



Dear Mr. Abbey

The members of our League are concerned about application of the Shell Oil Company for a permit to drill for oil in the Everglades National Park.

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We understand that the environmental impact statement funded by this company is based on out-dated maps which have been used to support erroneous conclusions. However, since the possibility of an oil spill can never be completely ruled out we consider the risks implicit in this proposal to be unwarranted.

The Florida Keys are particularly vulnerable to any further degradation of the Everglades which are already severely distressed and in need of restoration. The waters of Florida Bay are dying, in large part because of pollution stemming from the lack of fresh water flowing into the Everglades. The degradation of this bay is a serious threat to our economy which is dependent upon our unique environment.

We therefore urge you to protect our fragile eco-system by refusing to grant this permit.

Respectfully yours,

Elizabeth C. Lemon
President.

O-78

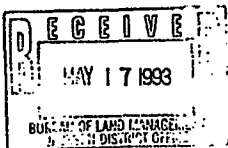


Legal Environmental Assistance Foundation

1115 NORTH GADSDEN STREET, TALLAHASSEE, FLORIDA 32303-6327 904-681-2591

May 13, 1993

Robert V. Abbey
District Manager
Bureau of Land Management
Jackson District Office
411 Briarwood Drive, Suite 404
Jackson, Mississippi 39206



Dear Mr. Abbey:

On behalf of the Legal Environmental Assistance Foundation, Inc. (LEAF) and our members in Florida, I am submitting comments on the Draft Environmental Impact Statement (DEIS) for the Shell Western E & P Inc. (SWEPI) proposal to build an exploratory well and test the potential hydrocarbon bearing formations at a site located on the Miccosukee Indian Reservation in Broward County, Florida. LEAF believes that the DEIS is fundamentally flawed because it fails to properly consider the applicability of the Safe Drinking Water Act to this activity and erroneously concludes that the disposal of drilling fluids and stormwater is not governed by federal Underground Injection Control (UIC) rules. This conclusion is based on a review of the legislative history of the Safe Drinking Water Act and the regulations implementing that Act.

Initially, Section 1421(d)(1) of the Safe Drinking Water Act, 42 U.S.C. 300h et. seq. defines underground injection as the "subsurface emplacement of fluids by well injection." The legislative history of this act conveys the extent of coverage of activities which should be regulated as underground injection. House Report 93-1185 provides:

The definition of underground injection is intended to be broad enough to cover any contaminant which may be put below ground level and which flows or moves, whether the contaminant is semi-solid, liquid, sludge or any other form or state.

This definition is not limited to the injection of wastes or to injection for disposal purposes; it is intended also to cover, among other contaminants, the injection of brines and the injection of contaminants for extraction or other purposes.

Thus, the disposal of drilling fluids and stormwater through a well is indeed underground injection and should be regulated as such.

A Public Interest Law Firm
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Second, in response to the intent of Congress, the U.S. Environmental Protection Agency (EPA) has defined "well injection" as the subsurface emplacements of fluids through a bored, drilled or driven well; or through a dug well, where the depth of the dug well is greater than the largest surface dimension. 40 CFR 144.3(1992). EPA further clarified the scope of the underground injection control regulations by enumerating specific exclusions in 40 CFR 144.1(g)(2)(1992). This same section also provides a list of wells specifically included among those types of injection activities which are covered by UIC regulations; however, the regulation clearly indicates that the list is not intended to be exclusive but is for clarification only. 40 CFR 144.1(g)(1)(1992). A review of these regulations clearly shows that the activity at issue is not excluded from regulation under the UIC program.

32

Third, the DEIS erroneously relies on an incorrect interpretation of a Preamble to Proposed UIC rules to justify the exclusion of this activity from UIC regulation. The DEIS states that federal and state UIC regulations do not apply to the subsurface emplacement of fluids during the construction of oil or gas wells, citing the preamble discussion in 41 Fed. Reg. 36732 (Aug. 31, 1976). According to the preamble, the definition of well injection "does not cover a situation such as the construction of an oil or gas production well." Reliance on this language is inappropriate for several reasons. Initially, LEAF submits that a preamble to a proposed regulation does not supercede current regulation found in 40 CFR 144 (1992). As mentioned previously, this activity does not fall within the enumerated exclusions provided in 40 CFR 144.1(g)(2) (1992).

Further, LEAF submits that the disposal of drilling fluid and stormwater through a drilled well into an interval of the Floridan aquifer is not part of the construction process. This emplacement of fluid occurs after the construction of the oil production well, and is a separate, distinct activity from the withdrawal process. It is uncontested in this case that there is subsurface emplacement of fluids through a bored, drilled or driven well. Accordingly, failure to apply underground injection control regulations to this disposal activity renders the DEIS fundamentally flawed.

Ironically, while the DEIS disclaims responsibility for complying with UIC regulations, it states that the operation plan will incorporate many of those regulations applicable to this type of activity. However, LEAF submits that those regulations necessary to prevent endangerment are not incorporated into the proposed plan of action. While the DEIS describes standards required by 40 CFR 146.22 (1992) which will be incorporated, it fails to indicate whether significant additional requirements required by 40 C.F.R. 146.23 (1992) and 40 C.F.R. 146.24(1992) will also be met. In particular, regarding 40 C.F.R. 146.23 (1992), the following requirements are ignored: observation of injection pressure, flow rate, and cumulative volume of fluid injected; demonstration of mechanical integrity; and, reporting of monitored

O-80

data. Regarding 40 C.F.R. 146.24(1992), the following requirements are not met: a map showing the injection well and the area of review, including identification of all producing, injection and abandoned wells, dry holes, and water wells; surface bodies of waters, mines, residences, roads, and faults; tabulation of data on all wells within the area of review which penetrate the proposed injection zone or formations affected by the increase in pressure; appropriate geological data on the injection zone and confining zone; geologic name and depth to bottom of all underground sources of drinking water which may be affected by the injection; and a certificate that the applicant has assured through a performance bond or other appropriate means, the resources necessary to close, plug or abandon the well. Accordingly, protection of Underground Sources of Drinking Water is not adequately addressed in the DEIS.

As a separate issue, LEAF questions the applicability of offshore surface water discharges to the management of drilling fluids (see p. 4-32). LEAF submits that EPA rules governing on shore surface water discharges, found at 40 C.F.R. 435.31 Subpart C (1992) should apply. Accordingly, because the DEIS failed to consider appropriate standards for management of drilling fluids, it is flawed.

It is axiomatic that the purpose of an Environmental Impact Statement is to ensure that federal agencies have sufficiently detailed information to decide whether to proceed with action in light of potential environmental consequences. Given that the DEIS fails to evaluate the impacts associated with disposal of drilling and other fluid through a well and the legal implications of such action, LEAF submits that the requirements of the National Environmental Policy Act have not been met. Until compliance with this law has been achieved, the action proposed in this DEIS should not proceed.

Sincerely,

B. Suzi Ruhl
B. Suzi Ruhl, J.D., M.P.H.
President

gen.abbey,lt

cc: Senator Bob Graham

78

O-81



NATIONAL COUNCIL OF JEWISH WOMEN
NATIONAL COUNCIL

915 Pine Ridge Dr.
Plantation, FL 33317
May 29, 1993

Dear Mr. Abbey:

The Miccosukee have been duped by Shell Oil Co. into applying for an oil-drilling permit under Conversation Area Three.

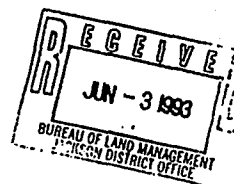
Oil and water don't mix over proposed offshore drilling.

Our drinking water and the Florida bay are seriously endangered by this proposed drilling.

Friends of Earth report that globally 11 billion gallons of oil are lost through leakage, venting, spilling and evaporation. Any accident could add to our problems downstream with the bay. We urge that this permit be denied.

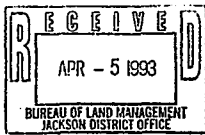
Sincerely,

Hana Rosenberg, Public Affairs



O-82

ECOLOGY CLUB



March 25, 1993

District Manager,
Bureau of Land Management.

I'm the president of Northeast High School's ecology club. I am very concerned about the oil drilling that is being planned in the everglades. There are also many other students and adults that are concerned and scared. Do you really believe that this oil drilling will cause no damage to the everglades or even our drinking water? Sir, please think about this before you finalize your decision. Did you think about all the things you would be ruining and even killing. I don't understand why shall can't drill some where else; somewhere that there is no wild life to be hurt, or damage our water supplies or ruin our wet lands. I think you are making a huge mistake if you go through with this. I will definitely see you at the public hearing April 14. Thank you for reading and considering my opinion.

Sincerely,

Chenmia Stowbridge
736 N.E. 38 St.
Ft. Lauderdale, FL 33334
(305) 566-7680

O-83

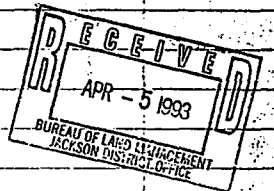
ECOLOGY CLUB

Dearest District Manager of the Bureau of Land Management,

I am writing to oppose the drilling which is soon to take place in the everglades. Many things can happen to the precious wildlife in those areas which I believe you have not considered. Apparently, someone must have thought the everglades was important, because they made it a Nat'l forest park. By drilling in these areas serious problems could occur in our fresh water aquifers. Please take these things into consideration when deciding to drill. These plants and animals need a safe habitat to live and everglades is one of the few wildlife sanctuaries which are still untouched. Those things are important to both myself and many others.

PLEASE THINK!

Sincerely,
Maya Leigh Burns
MAYIA LEIGH BURNS



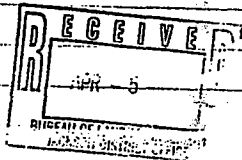
O-84

ECOLOGY CLUB

Dear District Manager, Bureau of Fort Lauderdale,

District manager, I think that the oil drilling process is ludicrous. The oil can pollute our fresh water. Drilling will damage the everglades and its wildlife. By your oil drilling, and placing your equipment, will damage the everglades. Natural resources. Drilling will take pressure of Biscayne Aquifer. You are damaging the wildlife and people. If you not considering the wildlife, please take in consideration of your generation to come!

Sincerely yours,
Latoria Sutton



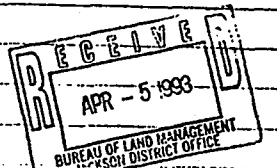
O-85

ECOLOGY CLUB

To whom it may concern!

I am very upset with the idea of drilling in the everglades. It is very stupid to think that the drilling would not affect the wildlife and our water supply. Drilling will damage and destroy the everglades. If you are willing to drill (destroy) in the everglades, you are willing to destroy a part of life, a huge part of life. I oppose your decision to drill in the everglades. I hope you consider the life you are taking in your hands!

Displeased,
Melissa Richs
Northeast High School Ecology



O-86

O-87

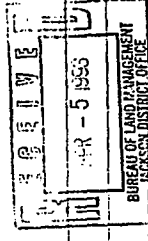
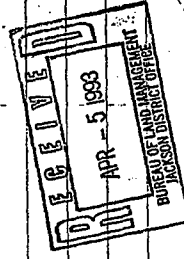
ECLOGY CLUB

ECLOGY CLUB

District Manager of Bureau of Land Management,

I am hoping that you will sit down and think through your idea about the oil drilling in the Everglades. Please consider our animals & other wildlife. People are fighting so hard to protect the planet. With a touch you put it's our home. Even at all of the clothes our water table is very low to begin with. Imagine the damage you could cause. I'm hoping you'll realize the life threatening possibilities.

Thank you
P.S. go visit the Christy Sigmund
maneu. Strongly

District Manager Bureau
of Land Management,

I am writing this letter concerning the oil drilling that will take place in the Everglades. I think that will not be a good idea because the water is very low and all the things they have there that stay like memory for other people to visit. The national park which is very famous on the other hand, drilling will damage the Everglades completely.

yours,
Frank Lincoln

O-88

O-89

ECLOGY CLUB

ECLOGY CLUB

To
District Manager of
Bureau of Land Management

I am a student in Northeast High School and am also a member of the Ecology Club. Everglades are going to have a oil drill, however, I don't think I understand, Everglades is a national park. Then why should there be oil drill? What about the wild life? Is it not a national park in our home to save wild life? I believe an oil drill would damage the wild life. Also, still in saving our water supply would not be damage. But why would you drill a hole on the ground and not changing water? It would be stupid to think nothing would happen to the water. Also, if a hole is drill, then salt intrusion would occur faster and the water environment would change. Causing damage to both water supply and the environment. So please consider not to drill an oil well because many can get the natural environment and water supply. Thank you!

Sincerely,

Steve D. O.P.

3/24/93

to Whom it may Concern,

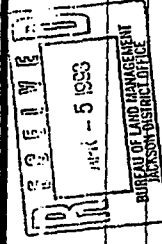
You are once again on a selfish trip to create revenue for your own pockets. We need to leave what is left of our untouched nature alone. It is ludicrous to think that you can drill for oil and not harm the Everglades. It will take pressure of the Private Agri-fish and effect our drinking water. Many plants and animals will be injured and very life depends on this natural habitat. By invading the Everglades with industrialism you destroy the serene atmosphere and living animals. Your past experiences in clearing up for the wilderness have proved your sloppiness and carelessness. I am asking you not to tamper with nature, it wasn't meant to be. Please think with a clear head.

NO. 55 4481 NW 19TH AVE
OAKLAND PARK FL 33309

Sincerely,

Hillit Dayne

HILLIT DAYNE



O-90

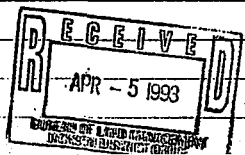
ECOLGY CLUB

To whom it may concern,

I am appealing to you out of concern pertaining to the drilling of oil in the Everglades. I am concerned of whether or not you are aware of the damages that this drilling can cause. Point 1, it takes pressure off Biscayne aquifer and point 2, it expedites salt water intrusion. I don't seem to think that I am the only one who is concerned about this. People need to realize that there are things of more importance, like our environment than some oil drilling for whatever purpose it maybe. I am appealing to your conscience and common sense and whether or not you feel this is wrong. Please think twice before performing such disastrous task.

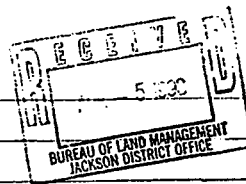
Sincerely (a concerned student)
Mildraide Lazorce

870 S.W. 6th St. Apt B
Pompano Beach, Fl. 33060



O-91

ECOLGY CLUB



310 S.W. 2nd St. Hpt
Pompano Beach Fl.
33060
3/20/93

District manager
Bureau of land management
Dear Sir or Madam:

I heard about the upcoming drilling in the Everglades. I'm concerned and I was wondering if you were aware of the drilling damages that could occur if not only could damage the Everglades including wild life but it also takes pressure off Biscayne Aquifer and expedites salt water intrusion.

Please think before you act.

Sincerely Yours
Mildraide Lazorce
Gretha Louis

O-92

ECOLGY CLUB

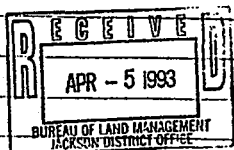
To whom it may concern:

3/24/93

I'm a concerned student from a heart high school. I read an article in the newspaper about the Shell company wanting to drill oil in the everglades. And they feel that it won't damage the wildlife or the clean water supply. They're making mistakes. Shell needs to realize that drilling is not as important as our home, the earth and the only natural park left in Florida. We have seen the results of how responsible and careless the Shell company is. They've displaced this with the oil spill in Alaska. Thank you very much.

173 N.E. 45th St.
Ft. Lauderdale, Fl.
33334

Sore,
Lisel
Luis



O-93

ECOLGY CLUB

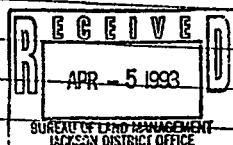
1499 N.E. 39th St.
Oakland Park
Fl 33334
3/24/93

District Manager
Bureau of Land Management

Dear Sir/Madam:

I would like to state that it is ludicrous to think that drilling in the Everglades will not affect the environment and our water supply. Let's face it, a lot of times we say that things aren't going to happen but they do. I am not being pessimistic but anything but we have to face the facts. Please don't drill in the Everglades; if not for our water supply purposes, at least for the wild life that live there.

Sincerely,
Andrea O'Connor
ANDREA O'CONNOR



O-94

ECOCLOGY CLUB

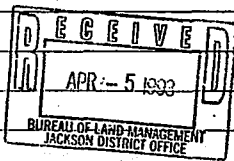
To whom it may concern:

I don't agree with your idea to drill in the Everglades. It is ludicrous to think that you want to destroy our wildlife or our water. With this drilling you could hurt a lot of our waterlife, wildlife, and plantlife that is precious to us. It could also put a strain on the amount of drinking water we have because your oil drilling would pollute, so badly affect our drinking water. Oppose your decision!!!!

Sincerely,

Aimee Dawn Martin

641 N. E. 37th Street (Northeast High School Ecology Club)
Homeland, FL 33044



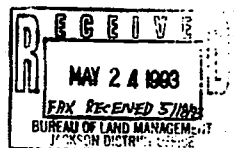
O-95

SAVE THE
FLORIDA
PANTHER



May 17, 1993

Mr. Robert V. Abbey
District Manager
Bureau of Land Management
411 Briarwood Drive, Suite 404
Jackson, Mississippi 39206



Dear Mr. Abbey,

In accordance with a request for public comment on the Draft Environmental Impact Statement (DEIS) for the proposed Shell Western E&P Inc. (SWEPI) Miccosukee 3-1 Exploratory Well on the Miccosukee Indian Reservation, Broward County, Florida, we submit the following comments. (These comments are to supplement our oral comments presented at the public hearing held in Fort Lauderdale in April 1993.)

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The DEIS for the proposed activity on the Miccosukee Reservation can only be viewed as an empty--though costly--attempt to placate the public. The DEIS is full of discrepancies and excludes compelling, current and comprehensive data that would clearly cause the Bureau of Land Management (BLM) to deny the SWEPI proposal due to flagrant violations of the Endangered Species Act of 1973 (Act) and glaring miscommunication (or lack of intra-agency cooperation) among several pertinent agencies within the Department of the Interior (DOI). Please refer to the DOI United States Fish and Wildlife Service (FWS) Joint Draft Florida Panther Habitat Protection Plan (Plan).

The DEIS fails to adequately address the potential impact on wildlife species. Panthers have been documented to leave an area when humans arrive. The activities associated with exploration and drilling will certainly modify the normal behavior of Florida panthers and other endangered or listed species. Human presence in the hunting season is enough to drive panthers from their home ranges--it is obvious that seismic testing, workers, vehicles, construction and all manner of disturbance will accompany this project.

The point of listing a mammal on the endangered species list is not to keep it listed, but to bring about the recovery of the taxon. This includes preserving, protecting and properly managing habitat. Habitat comes in varying degrees of suitability--and although the site (pasture) is improved, panthers do utilize the area as a movement corridor connecting home range and for dispersal of young panthers.

SAVE THE FLORIDA PANTHER, INC.
P.O. BOX 22369 FT. LAUDERDALE, FL 33335-2369
1-800-8 FLA CAT
(305) 524-1839 FAX (305) 524-1839

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One important fact concerning Florida panthers--they are elusive. Because of their propensity for large ranges, they move back and forth from private lands, public lands and the reservation(s). Florida Game and Freshwater Fish Commission (GFC) admits that there are more panthers than are documented with telemetry. In other words, we do not know how many uncollared panthers exist, nor do we know much about their movements or ranges.

On p. 4-55 of the DEIS, it is stated "Direct effects are highly unlikely as a result of the proposed action, since panthers are not known to utilize the proposed site for any stage of their life cycle. Indirect effects to panthers through decline in habitat, decreases of individual home ranges or panther geographic range or decreases in prey item availability is unlikely as well."

Panther activity has been monitored for more than ten years. The distribution clearly documents panther movement in the area, and at least one male panther has used the area for dispersal. The panther will be directly affected by the proposed construction and drilling.

87

"...The increase in activity may discourage use of the area by young males, but this area is not routinely used by panthers...The potential for collision related mortality resulting from increased traffic along the route would increase slightly during construction and drilling operations. This temporary increase would be expected to be negligible, as panthers rarely utilize this area. It is anticipated that drilling operations would continue 24 hours a day..."

Vehicular collisions have been the leading cause of death of the panther. The genetic viability of the panther is so precarious that "The consensus of...experts is that additional loss of a single panther, especially if it were an animal of critical genetic or demographic importance, could jeopardize the species..." (Warren T. Olds, Biological opinion issued by FWS, Service Log Number 4-1-93-217).

The involvement of the Department of the Interior's own BLM, the Bureau of Indian Affairs (BIA) via the Miccosukee tribe and the FWS creates what appears to be a conflict of interest. By BLM's managing land and mineral rights and BIA negotiating contracts with multi-national gas and oil corporations for the benefit of the Miccosukee tribe and FWS actively pursuing a multi-million dollar habitat protection plan to implement, a conflict of interest arises. How can DOI resolve the problem of it's own agencies working on individual projects and balance intra-agency cooperation when addressing pertinent overlaps? The situation is

O-97

replete with conflict with the mineral rights of US Trust land held by the US for the Miccosukee tribe also being part of imperative habitat included in the FWS DHPP. While agencies must be responsible to the DOI for their actions, the panther's chances for survival are rapidly vanishing because one hand does not know what the other is doing.

It must be noted that the Miccosukee Tribe and Reservation is subject to federal law. "The land is held in trust by the United States Government for the benefit of the Miccosukee Tribe. All lands are managed as "trust resources" and require development for the economic benefit of the Reservation while protecting the resources for future generations. Reservation lands are managed for improved pasture (irrigated), wildlife habitat, and some citrus production.

"Although not specifically managed for the Florida panther and other endangered species, the Miccosukee Reservation is subject to all Federal endangered species regulations." Florida Panther Habitat Protection Plan, February 1993, Appendix A at A-4. [emphasis added.]

It has been repeated over the years during public hearings held from Boston to San Francisco to Key West--drilling is an unacceptable risk, even with best available technology. There is no difference in the public sentiment regarding drilling in the Everglades/Miccosukee Reservation--even though the political situation is uncomfortable.

The bottom line is that the risks which accompany any operation such as this far outweigh the benefits from a contract for exploration.

Save the Florida Panther makes the following recommendations:

88

1) Based on comprehensive telemetry data maps from a ten year study conducted by the GFC, we recommend that the BLM acknowledge that a formal consultation under Section 7 is in order to review the proposed project's impact on the endangered Florida panther.

89

Further, the BLM and BIA must commit to over-see benign, non-consumptive land-use on the Reservation because of documented panther range. Matters of endangered species preservation must be given priority when activities are proposed which are inconsistent with recovery, specifically that of the Florida panther.

O-98

O-99

- 2) Review the Florida Panther Habitat Protection Plan. This will familiarize the lead agencies (BLM and BIA) with pertinent sections of the Act and will provide the awareness that applying for the required permit to take panthers in order to explore and drill will prove to be an insurmountable obstacle to drilling in documented panther range.
- 3) Create an advisory committee comprised of members of private and public environmental and scientific organizations to act as independent advisors to the Miccosukee (and Seminole) tribes concerning matters of environmental stress and impact on natural systems and listed species.
- 4) Finally, we recommend that due to strong opposition to this proposal from the public, the BLM is compelled to deny SWEPI's proposal to explore and drill for oil in this crucial habitat and near Conservation Area 3.

85

Exploration cannot be justified on the grounds that drilling is currently under way in Big Cypress National Preserve. Any additional disturbance in or around panther habitat must not be allowed to be repeated and will not be tolerated.

We thank you for the opportunity to comment on the DEIS.

Sincerely,

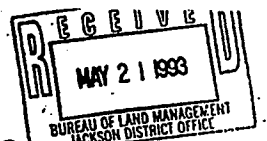
Catherine S. Dees
Catherine S. Dees
Acting Executive Director

CC: Mr. Bruce Babbitt, Secretary of the Interior

SIERRA CLUB



BROWARD COUNTY GROUP



February 12, 1992 (?)

Larry Marvet
Conservation Chair
9437 N.W. 45th Street
Sunrise, Florida 33351
(305)742-0495 home
(305)475-6164 work

Mr. Robert V. Abbey
District Manager
Bureau of Land Management
411 Briarwood Drive, Suite 404
Jackson, Mississippi 39206

Dear Mr. Abbey,

I have attached the official written comments of the Broward Group of the Sierra Club concerning the Draft Environmental Impact Statement on the proposed Shell Western E & P, Incorporated Test Well #3-1. If you have any questions, please call me at the above numbers.

Sincerely,

Larry Marvet
Larry Marvet
Conservation Chair

O-100

O-101

SIERRA CLUB



BROWARD COUNTY GROUP

May 18, 1993

Official Technical Comments
Concerning Miccosukee Test Well #3-1
Proposed by Shell Western E & P
Draft Environmental Impact Statement

Broward County Group of Sierra Club
Larry Marvet, Conservation Chair
(305)742-0495

The Draft Environmental Impact Statement (DEIS) for Shell's proposed Miccosukee Test Well #3-1 is fatally flawed and, thus, does not meet the requirements of the National Environmental Protection Act (NEPA). Until all requirements of NEPA are met, the proposed action must not take place. Deficiencies are described below:

Air Quality

- The gas flaring procedure was improperly evaluated. Dispersion of heavy metals and other contaminants needs further review.
- No air pollution monitoring was proposed. No baseline data was taken. No pollution modelling or prediction were undertaken.

7

Construction

- The transportation, storage, and toxicity of the on site chemicals in not fully evaluated.
- Long term evaluation of future migration of chemical, brine, petroleum and other contaminants is not fully evaluated nor are long term monitoring programs proposed.

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Cumulative Impacts

- The impact of the proposed action taken in conjunction with other impacts on the Everglades ecosystem is not fully explored. Obviously, a tremendous number of problems have occurred before this well was conceived, so the addition of the proposed well's impacts must be evaluated in combination with all other impacts to get a clear understanding of the effects on the environment.

13

Needs Assessment

- The decision to reject the No Action Alternative because it does not meet the objectives of the project is an improper restriction of the alternatives. This restriction can only lead to one choice, drilling, though the true objective is to obtain energy for consumers. Thus, alternative energy sources, conservation, etc. must be considered.

8

Noise

- The effects of noise on wildlife are inadequately evaluated. Only low constant engine noise is even superficially covered. Sharp, high pitched noises—typically disruptive to wildlife—will be generated yet are not evaluated.

64

Segmentation

- The decision to segment this exploratory well from future production wells is flawed. Knowledge of the geology through nearby drilling projects and seismic data is extensive. Shell would not undertake this project in such a sensitive place unless the success probability was high. The EIS must be rewritten to include the production scenario.

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Socioeconomic Analysis

- Analysis of impacts of the well operation on nearby communities is inadequate.

67

Wildlife

- The potential effects on wildlife, especially the listed species, is inadequate, bordering on irresponsibility. Though Florida panthers—possibly the most endangered animal in the USA—are known to visit the area, the impact on them is given little consideration. The same goes for the other listed animal.

86

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Wetlands

- The vegetation report was done at the peak of a drought and is not representative of the true character of the area.
- No consideration was given of the vegetation near Snake Road.

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74

Water Quality

- Effects of the proposed action on the Biscayne Aquifer are not addressed through a determination that the aquifer is far from the site. Yet the actual location of the aquifer is in dispute and two dimensional spill modelling is certainly a simplification of the entire system. Considering that the Biscayne Aquifer is designated the "sole source" of drinking water for South Florida pursuant to the Safe Drinking Water Act, Subsection 1424 (e), it is unconscionable that a more detailed and exact analysis was not undertaken. Additionally, the Environmental Protection Agency must be consulted and asked to make a "sole source review" of the action.
- Effects on both the Floridan and Gray Limestone aquifers were inadequately evaluated. Both aquifers are potential sources of fresh water and must be assessed as such. South Florida is short on fresh water at this writing, and the use of the Floridan and Gray Limestone aquifers is certainly foreseeable.

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LG-1

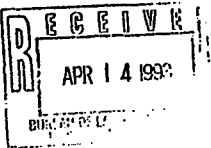
LG-2



JOHN P. HART, COMMISSIONER
Board of County Commissioners
(305) 357-7003 • FAX (305) 357-7295

April 14, 1993

Mr. Robert V. Abbey, District Manager
Bureau of Land Management
411 Briarwood Drive, Suite 404
Jackson, Mississippi 39206



SUBJECT: Shell Western E & P Proposed Exploratory Oil Well
Broward County, Florida - Draft Environmental Impact
Statement

Dear Mr. Abbey:

This letter constitutes preliminary comments by Broward County concerning the above-referenced Draft Environmental Impact Statement (DEIS). Detailed comments will be offered prior to the May 18, 1993 comment period deadline.

In my January 23, 1992 letter to Mr. Sid Vogelpohl of your agency, and in my appearance before the panel at the public hearing on that date, a number of concerns were expressed which pointed out the need for an in-depth analysis of the possible impacts of this project. These issues included:

- * The potential for water quality impacts to the aquifers of South Florida;
- * Possible surface water contamination of the Water Conservation Areas and associated canals;
- * Adverse impacts to wetlands and wildlife as a result of the proposed activities;
- * The potential for emissions of process contaminants into the ambient air stream during the project;
- * The necessity for analysis of the cumulative impacts of the work, and the use of "worst-case" scenarios in the study;
- * An evaluation of the benefits of the project to the people of South Florida, as well as an estimate of the environmental risks involved.

We believe that none of the above concerns has been adequately addressed in the DEIS, and that the document is deficient, both fundamentally and specifically, in its fulfillment of NEPA requirements. The remainder of this letter will briefly outline our objections.

BROWARD COUNTY GOVERNMENTAL CENTER ■ 115 SOUTH ANDREWS AVENUE ■ FORT LAUDERDALE, FLORIDA 33301

Mr. Robert V. Abbey
April 14, 1993
Page 2

The DEIS is fundamentally flawed in the following ways:

- 22 * The need for the proposed action is not only not established, it is not even addressed. It is highly doubtful that a discovery of oil and/or gas in this sensitive ecosystem will contribute significantly to the United States' oil reserves.
- 13 * The cumulative impacts of the action are not examined. If a discovery is made, this very well would become a production well, and many more would be drilled. The argument "disconnecting" or "segmenting" this "wildcat well" from consideration of future actions is specious. With wells producing from the Sunniland formation in relative proximity to the site, and with thorough seismic data from the area, the proposed well is no wildcat, and consequences of a discovery must be addressed in detail. On the other hand, if the chances of discovery are as slight as claimed, it is difficult to understand why millions are being spent on this test well. A seven percent chance of discovery is certainly not worth the expense or the environmental risks involved.
- 8 * The blithe dismissal of the no-action alternative violates the requirements of Section 1502.14(d) of NEPA, which mandates its consideration. Analysis of this alternative would force a demonstration of project need.
- 61 * No effort was made to enlist EPA as a Cooperating Agency, which would utilize EPA's expertise in many of the considered criteria.
- 25 * As if prepared in a vacuum, the DEIS makes no reference to the potential water level and water delivery changes which may occur as a result of the upcoming Everglades Restoration Project. Such changes could have a dramatic impact on the hydrology, vegetation, and wildlife at the project site.
- 62 * The Consultant's Disclosure Statement, required by NEPA Section 1506.5(c), is omitted from the document.
- 8 * The document as a whole fails to consider the range of reasonable alternatives and fails to objectively analyze the impacts of the proposed action under worst-case scenarios, as required by NEPA. The analysis must include the "No-Action" alternative, and it must include an evaluation of the wide-ranging impacts of a discovery by this test-cum-production well. In its present form, this DEIS is nothing more than an attempt to justify the proposed action, and it certainly does not fulfill NEPA mandates.
- 9

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Mr. Robert V. Abbey
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Page 3

The DEIS is technically deficient in the following specific areas, among others:

- * Air Quality.
 - o There is little evaluation of the gas flaring procedure. Poor combustion could result in dispersion of metals such as mercury and cadmium, oily particulates, and other combustion products over a wide area around the burn pit. This is a demonstrated phenomenon.
 - o There is no explanation on how the design of the burn pit will mitigate air impacts. Data should be collected which will measure actual air quality effects. These should include particulate monitors, metals analysis of flare fallout, volatile organic compounds, etc. The document did not contain predictive air pollution modelling, and indeed dismisses the possibility of measurable air pollution altogether, citing the proximity of the highway. The presence of a highway nearby does not relieve SWEPI of the responsibility under NEPA to examine the potential for the discharge of toxic air pollutants from the project.
- Waste Management.
 - o Storage and disposal of drill cuttings is not sufficiently examined. The cuttings, which are judged dangerous enough to warrant storage in a lined containment area, may not be appropriate material for disposal either on Miccosukee land or in a Broward County landfill.
 - o Specifications for the plastic liner are contradictory in the document. On some pages, the minimum liner thickness is required to be 12 mils, and in other sections, it is specified as 20 mils. Consistency and standardization of requirements is important to avoid confusion.
 - o There are no explanations or drawings to indicate how drill cuttings get from the drilling rig/mud system to the storage area without contamination of the intervening space with drilling fluids and downhole materials.
 - o The bermed "water retention area" was designed for a three-day, 100-year precipitation event, which would total 12 inches of rainfall in the three days. In fact, rainfall amounts in some Broward County locations have exceeded this amount several times in recent years.

Mr. Robert V. Abbey
April 14, 1993
Page 4

- 35 When (not if) rainfall exceeds the document's "worst-case" estimates, the site will be flooded and contaminated stormwater will be discharged.
- 32 o How will excess drilling fluids be injected into the boulder zone? Where are the injection wells? How much oil and other contaminants will be allowed in the injected fluids? We have serious concerns about disposal into the boulder zone of unspecified materials -- materials which may be classifiable as hazardous waste.
- * Well Construction
 - o There is insufficient discussion of the composition, transport, and storage of drilling fluid components. Many of the possible ingredients of drilling mud are considered toxic in concentrated form. How will the chemicals be transported to the site? How will they be stored? Exactly what chemicals, and in what quantities, will be utilized?
 - o In other areas, abandoned oil and gas wells are leaking brine, petroleum product, and other chemicals. In fact, the DEIS mentions that two wells in the nearby Raccoon Field developed casing leaks. What assurances do we have that this well will not develop leaks, either during the project or long after abandonment? How will SWEPI address future leaks and contamination? Will SWEPI commit to future monitoring and cleanup? Have contamination assessments been performed on abandoned well sites in Florida? What were the results? These issues must be addressed in the document.
- * Wetlands and Wildlife.
 - o The fieldwork for Appendix A-5, Vegetation Report, was conducted during November and December, 1989, which was the dry season, and at the peak of a three-year drought. Vegetation and hydrology likely were very different then than now. Since the Corps of Engineers' jurisdictional determination is due to expire in June, 1993, a revised jurisdictional determination must be performed, which may result in a reclassification by the Corps of the vegetation in the vicinity.

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Mr. Robert V. Abbey
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- o The vegetation maps in the DEIS are not based on Appendix A-5, Vegetation Report, but rather on a separate study done by the consultant. This study, based on aerial photography and ground-truthing, did not even consider vegetation adjacent to Snake Road, upon which every truckload and drumfull of fuel, lubricant, hydraulic fluid, mud chemical, and waste product will be transported. 74
- o The ecological significance of this ecotone (transitional area) between the WCA and the Big Cypress is downplayed in the document. Ecotones are highly productive and are vital to indigenous wildlife. 90
- o In the DEIS, two endangered Florida panthers were documented in the vicinity of the project. The document predicts "negligible" impact to this barely tenable species. It is the accumulation of such "negligible" impacts that has led to the dramatic decline of this wide-ranging animal. Can the panther population survive another "negligible" impact? Should we find out? 87
- o In addition to the panther, the Everglades Snail Kite, the Wood Stork, the Eastern Indigo Snake, and several other listed species utilize nearby areas as habitat and/or feeding areas. The document does not adequately address the potential impacts on these animals of worst case spill/discharge scenarios. Broward County feels that any impact on endangered species is sufficient to preclude this project, the benefits of which have not been established. 86
- * Water Resources.
 - o The document states that the Biscayne Aquifer, the sole source of South Florida's drinking water, lies 5 to 10 miles from the project site. This statement is based on the map in the document that dates from 1978. A 1987 map and study by the USGS show the western edge of the aquifer only 2 to 3 miles east of the site. This discrepancy in the analysis means that the impact evaluation does not accurately reflect potential effects of a spill or discharge. In fact, the spill scenarios and dispersion models used in the document are wholly inadequate to predict the effects on the Biscayne and other aquifers in the area, and on the overlying WCA. Realistic worst-case spills, weather events, and long-term leakage scenarios are not examined, either for this one test well or for the inevitable expansion of activities upon discovery. 26

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Mr. Robert V. Abbey
April 14, 1993
Page 6

- 34 o The Floridan and Gray Limestone aquifers, possible future sources of potable water for South Florida, are treated as expendable repositories for unspecified wastes. This cavalier treatment of our most important resources is inexcusable in a document of this magnitude.
- 36 o The hydrology analysis fails to appreciate that the canals in the area are indeed water conveyance systems and do not "limit water flow" as claimed in the document. A spill or discharge into one or more of these canals is relatively likely. The document does not detail cleanup methods or procedures, or offer mitigation with respect to spills.
- * Noise and Visual Resources.
 - 64 o These sections of the document are superficial and contradictory. The noises generated are stated as likely to be sharp, high frequency noises, while the impacts are assessed based on the effect on wildlife of low, constant engine noises, which are less disruptive.
 - 75 o The analysis of visual resources fails to note the intuitively obvious fact that, even in the presence of some buildings and billboards, a 170 foot tall, well-lit tower with a 30 foot high working platform will be a visual spectacle for miles, especially at night. Interestingly, there is very little analysis on the visual impact of the project on wildlife.
- * Socioeconomic Analysis.
 - 67 o The socioeconomic analysis is superficial and totally inadequate. There is no discussion of where the skilled workers will come from, where they will live, where they will buy food and supplies, and how their activities will impact neighboring communities. Without an examination of the services necessary to support the drilling operations, it is impossible to effectively assess the potential socioeconomic impacts from the proposed action.

Conclusions.

Perhaps the best testimony for the philosophy which has evidently governed the preparation of this DEIS is a quote from the Visual Resources section: "...other observers may not perceive any reduction in visual quality and may even consider the rig a novel sight adding variety to an otherwise monotonous, boring landscape".

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Mr. Robert V. Abbey
April 14, 1993
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Mr. Abbey, you may take my word for it when I say that few responsible people in Broward County regard the Everglades landscape as "monotonous" or "boring". In fact, we regard the Everglades as in part defining what South Florida is, and one of its essential and beautiful components. And we are not alone in this assessment. Secretary of the Interior Bruce Babbitt has made protection, restoration, and enhancement of the Everglades a "top priority" of his agency. I sincerely hope that this proposal is not representative of the Department of the Interior's "concern" for the Everglades. The document regards the risks as "minimal". I say to you that risks considered minimal in many other areas of the country are magnified greatly when applied to our precious Everglades.

This DEIS does not address the concerns that I expressed to you on January 23, 1992. This document does not adequately assess the impacts of this action; indeed it in no way justifies proceeding with the action. This project will provide virtually no benefits to the majority of South Florida residents and visitors, and will place an extremely sensitive, irreplaceable, and already damaged ecosystem in greater danger. Divorcing this test well from the consequences of what will follow, should the test succeed, defies all logic. It is doubtful that SWEPI is spending \$5 million to install this well based on a seven percent chance of discovery. Sophisticated seismic studies and evaluations of nearby producing fields have surely indicated a likelihood of discovery far greater than that claimed in the DEIS. When that discovery occurs, this well will become a production well, and it will be joined by several, perhaps many, more. This document must be expanded to include analyses of the impacts of these very likely activities. Until this occurs, Broward County will continue to object to this project in the most strenuous terms.

Thank you for the opportunity to comment on this document.

Sincerely,



John P. Hart, Commissioner
Broward County Board of County Commissioners

LG-8



Department of Natural Resource Protection
Administration
500 E. Broward Boulevard, Suite 104
Fort Lauderdale, FL 33394
(305) 765-5181 • FAX (305) 765-5198

May 18, 1993

Mr. Robert V. Abbey, District Manager
Bureau of Land Management
411 Briarwood Drive, Suite 404
Jackson, Mississippi 39206

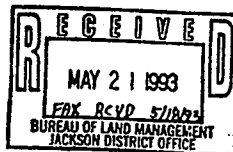
RE: Shell Western E & P Proposed Exploratory Well
Broward County, Florida -- Draft Environmental Impact Statement

Dear Mr. Abbey:

The Department of Natural Resource Protection (Department) has reviewed the above-referenced Draft Environmental Impact Statement (DEIS) and finds that this document does not adequately address the potential impacts of this proposed well drilling operation on the south Florida environment.

Among the issues that require a more in-depth analysis of their potential impacts are:

- The potential for emissions of process contaminants into the ambient air stream during the project;
- The potential for water quality impacts to the aquifers of south Florida;
- Possible surface water contamination of the Water Conservation Areas and associated canals;
- Adverse impacts to wetlands and wildlife as a result of the proposed activities;
- The necessity for analysis of the cumulative impacts of the work, and the use of "worst-case" scenarios in the study;
- An evaluation of the benefits of the project to the people of South Florida, as well as an estimate of the environmental risks involved;



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Mr. Robert V. Abbey
May 18, 1993

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Without the appropriate level of information on these subjects, we do not believe that the Bureau of Land Management can make an intelligent decision on this proposed action and certainly cannot approve it in good faith.

In order to fulfil the requirements of the National Environmental Policy Act, these issues must be adequately addressed. An outline of our objections follows.

The Draft Environmental Impact Statement falls to adequately address the following:

- o Not only has the need for the proposed action not been established, it is not even addressed. It is highly doubtful that a discovery of oil and/or gas in this sensitive ecosystem will contribute significantly to the United States' oil reserves; 22
- o Section 1502.14(d) of NEPA mandates the consideration of the no-action alternative. The DEIS dismisses this alternative in violation of this section; 8
- o The Consultant's Disclosure Statement, required by NEPA Section 1506.5(c), is omitted from the document; 62
- o No effort was made to enlist the Environmental Protection Agency (EPA) as a Cooperating Agency, which would utilize EPA's expertise in many of the considered criteria. 61
- o The upcoming Everglades Restoration Project may result in changes to the water levels and water delivery schedules. Such changes could have a dramatic impact on the hydrology, vegetation, and wildlife at the project site. No reference to the Everglades Restoration Project or its potential impact on the SWEPI project area is discussed. 25
- o The cumulative impacts of the action are not examined. If a discovery is made, this very well would become a production well, and many more would be drilled. The argument "disconnecting" and "segmenting" this "wildcat well" from consideration of future actions is specious. With wells producing from the Sunniland formation in relative proximity to the site, and with thorough seismic data from the area, the proposed well is no wildcat, and consequences of a discovery must be addressed in detail. On the other hand, if the chances of discovery are as slight as claimed, is it difficult to understand why millions of dollars are being spent on this test well. A seven percent (7%) chance of discovery is certainly not worth the expenses or the environmental risks involved. 15

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Mr. Robert V. Abbey
May 18, 1993

Page 3

- 16 8 o The document as a whole fails to consider the range of reasonable alternatives and fails to objectively analyze the impacts of the proposed action under worst-case scenarios, as required by NEPA. The analysis must include the "No-Action" alternative, and it must include an evaluation of the wide-ranging impacts of a discovery by this test-cum-production well. As presently written, this DEIS is nothing more than an attempt to justify the proposed action, and it certainly does not fulfil NEPA mandates.

The DEIS is technically deficient in the following specific areas, among others:

AIR QUALITY

- o There is little evaluation of the gas-flaring procedure. Poor combustion could result in dispersion of metals such as mercury and cadmium, oily particulates, and other combustion products over a wide area around the burn pit. This is a demonstrated phenomenon.
- 7 o There is no explanation on how the design of the burn pit will mitigate air impacts. Data should be collected which will measure actual air quality effects. These should include particulate monitors, metals analysis of flare fallout, volatile organic compounds, etc. The document did not contain predictive air pollution modelling, and indeed dismisses the possibility of measurable air pollution altogether, citing the proximity of the highway. The presence of a highway nearby does not relieve SWEPI of the responsibility under NEPA to examine the potential for the discharge of air pollutants from the project.

WASTE MANAGEMENT

- 76 o Storage and disposal of drill cuttings is not sufficiently examined. The cuttings, which are judged dangerous enough to warrant storage in a lined containment area, may not be appropriate material for disposal either on Miccosukee land or in a Broward County landfill.
- 79 o Specifications for the plastic liner are contradictory in the document. On some pages, the minimum liner thickness is required to be 12 mils, and in other sections, it is specified as 20 mils. Consistency and standardization of requirements is important to avoid confusion.

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Mr. Robert V. Abbey
May 18, 1993

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- o There are no explanations or drawings to indicate how drill cuttings get from the drilling rig/mud system to the storage area without contamination of the intervening space with drilling fluids and downhole materials. 80
- o The bermed "water retention area" was designed for a three-day, 100-year precipitation event, which would total 12 inches of rainfall in the three days. In fact, rainfall amounts in some Broward County locations have exceeded this amount several times in recent years. 35
- When (not if) rainfall exceeds the document's "worst-case" estimates, the site will be flooded and contaminated stormwater will be discharged.
- o How will excess drilling fluids be injected into the boulder zone? Where are the injection wells? How much oil and other contaminants will be allowed in the injected fluids? We have serious concerns about disposal into the boulder zone of unspecified materials -- materials which may be classifiable as hazardous waste. 32

WELL CONSTRUCTION

- o There is insufficient discussion of the composition, transport, and storage of drilling fluid components. Many of the possible ingredients of drilling mud are considered toxic in concentrated form. How will the chemicals be transported to the site? How will they be stored? Exactly what chemicals, and in what quantities, will be utilized? 81
- o In other areas, abandoned oil and gas wells are leaking brine, petroleum product, and other chemicals. In fact, the DEIS mentions that two wells in the nearby Raccoon Field developed casing leaks. What assurances do we have that this well will not develop leaks, either during the project or long after abandonment? How will SWEPI address future leaks and contamination? Will SWEPI commit to future monitoring and cleanup? Have contamination assessments been performed on abandoned well sites in Florida? What were the results? These issues must be addressed in the document. 69

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Mr. Robert V. Abbey
May 18, 1993

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WETLANDS AND WILDLIFE

- 73 o The fieldwork for Appendix A-5, Vegetation Report, was conducted during November and December, 1989, which was the dry season, and at the peak of a three-year drought. It is likely that the vegetation and hydrology were very different then than now. Since the Corps of Engineers' jurisdictional determination is due to expire in June, 1993, a revised jurisdictional determination must be performed, which may result in a reclassification by the Corps of the vegetation in the vicinity.
- 74 o The vegetation maps in the DEIS are not based on Appendix A-5, Vegetation Report, but rather on a separate study done by the consultant. This study, based on aerial photography and ground-truthing, did not even consider vegetation adjacent to Snake Road, upon which every truckload and drumfull of fuel, lubricant, hydraulic fluid, mud chemical, and waste product will be transported.
- 90 o The ecological significance of the ecotone (transitional area) between the WCA and the Big Cypress is down played in the document. Ecotones are highly productive and are vital to indigenous wildlife.
- 87 o In the DEIS, two endangered Florida panthers were documented in the vicinity of the project. The document predicts "negligible" impact to this barely tenable species. It is the accumulation of such "negligible" impacts that has led to the dramatic decline of this wide-ranging animal. Can the panther population survive another "negligible" impact? Should we find out?
- 86 o In addition to the panther, the Everglades Snail Kite, the Wood Stork, the Eastern Indigo Snake, and several other listed species utilize nearby areas as habitat and/or feeding areas. The document does not adequately address the potential impacts on these animals of worst case spill/discharge scenarios. Broward County feels that any impact on endangered species is sufficient to preclude this project, the benefits of which have not been established.

Mr. Robert V. Abbey
May 18, 1993

Page 6

WATER RESOURCES

- o The document states that the Biscayne Aquifer, the sole source of southeast Florida's drinking water, lies 5 to 10 miles from the project site. This statement is based on the map in the document that dates from 1978. A 1987 map and study by the USGS show the western edge of the aquifer only 2 to 3 miles east of the site. This discrepancy in the analysis means that the impact evaluation does not accurately reflect potential effects of a spill or discharge. In fact, the spill scenarios and dispersion models used in the document are wholly inadequate to predict the effects on the Biscayne and other aquifers in the area, and on the overlying WCA. Realistic worst-case spills, weather events, and long-term leakage scenarios are not examined, either for this one test well or for the inevitable expansion of activities upon discovery. 26
- o The Floridan and Gray Limestone aquifers, possible future sources of potable water for South Florida, are treated as expendable repositories for unspecified wastes. This cavalier treatment of our most important resources is inexcusable in a document of this magnitude. 31
- o The hydrology analysis fails to appreciate that the canals in the area are indeed water conveyance systems and do not "limit water flow" as claimed in the document. A spill or discharge into one or more of these canals is relatively likely. The document does not detail cleanup methods or procedures, or offer mitigation with respect to spills. 34

NOISE AND VISUAL RESOURCES

- o These sections of the document are superficial and contradictory. The noises generated are stated as likely to be sharp, high frequency noises, while the impacts are assessed based on the effect on wildlife of low, constant engine noises, which are less disruptive. 36
- o In the presence of some buildings and billboards, a 170 foot tall, well-lit tower with a 30 foot high working platform will be a visual spectacle for miles, especially at night. Interestingly, there is very little analysis on the visual impact of the project on wildlife. 64

75

Mr. Robert V. Abbey
May 18, 1993

Page 7

SOCIOECONOMIC ANALYSIS

- o The socioeconomic analysis is superficial and totally inadequate. There is no discussion of where the skilled workers will come from, where they will live, where they will buy food and supplies, and how their activities will impact neighboring communities. Without an examination of the services necessary to support the drilling operations, it is impossible to effectively assess the potential socioeconomic impacts from the proposed action. 67

CONCLUSIONS

Perhaps the best testimony for the philosophy which has evidently governed the preparation of this DEIS is a quote from the Visual Resources section: "...other observers may not perceive any reduction in visual quality and may even consider the rig a novel sight adding variety to an otherwise monotonous, boring landscape".

Few responsible people in Broward County regard the Everglades landscape as "monotonous" or "boring". In fact, we regard the Everglades as in part defining what South Florida is, and one of its essential and beautiful components. And we are not alone in this assessment. Secretary of the Interior, Bruce Babbitt has made protection, restoration, and enhancement of the Everglades a "top priority" of his Agency. We sincerely hope that this proposal is not representative of the Department of the Interior's "concern" for the Everglades. The document regards the risks as "minimal". Risks considered minimal in many other areas of the country are magnified greatly when applied to our precious Everglades.

This document does not adequately assess the impacts of this action; indeed it in no way justifies proceeding with the action. This project will provide virtually no benefits to the majority of

Mr. Robert V. Abbey
May 18, 1993

Page 8

South Florida residents and visitors, and will place an extremely sensitive, irreplaceable, and already damaged ecosystem in greater danger. Divorcing this test well from the consequences of what will follow, should the test succeed, defies all logic. It is doubtful that SWEPI is spending \$5 million to install this well based on a seven percent chance of discovery. Sophisticated seismic studies and evaluations of nearby producing fields have surely indicated a likelihood of discovery far greater than that claimed in the DEIS. When that discovery occurs, this well will become a production well, and it will be joined by several, perhaps many, more. This document must be expanded to include analyses of the impacts of these very likely activities. Broward County is deeply concerned by the proposal and the cavalier manner in which it is being assessed.

Thank you for the opportunity to comment on this document.

Sincerely,

Mira Barer

Mira Barer
Director

c: County Administrator B. Jack Osterholt
Commissioner John P. Hart
Commissioner Suzanne N. Gunzburger
Commissioner Gerald F. Thompson
Commissioner Sylvia Pottier
Commissioner John E. Rodstrom, Jr.
Commissioner Lori Nance Parrish
Commissioner Scott I. Cowan
Assistant County Attorney Barbara Monahan
Chair Bruce Ownby/Natural Resource Protection Advisory Board

John J. Copelan, Jr.
County Attorney



OFFICE OF THE COUNTY ATTORNEY
115 S. Andrews Avenue, Suite 423
Fort Lauderdale, FL 33301

(305) 357-7600 • Telecopier (305) 357-7641 • Suncom 442-7600

May 17, 1993

Our File No. 01-322

Mr. Robert V. Abbey, District Manager
Bureau of Land Management
411 Briarwood Drive, Suite 404
Jackson, Mississippi 39206

Re: Shell Western E & P Proposed Exploratory Well
Broward County, Florida -- Draft EIS

Dear Mr. Abbey:

In addition to the comments submitted by the Department of Natural Resource Protection, Broward County would like to submit the following comments on the Draft Environmental Impact Statement (DEIS) submitted by Shell Western E & P Inc. (Shell). The DEIS fails to meet the requirements of Environmental Impact Statements imposed by the National Environmental Policy Act in the following areas:

- The DEIS only sets forth the effects of the exploratory well, without taking into consideration the environmental effects which will occur if oil is discovered and production ensues.

15

Shell's failure to consider the effect of oil development in the area is contrary to the holding of the court in *Conner v. Burford*, 848 F.2d 1441, 1450-1451 (9th Cir. 1988). While recognizing the speculative nature of oil exploration, the court in *Conner*, held that an EIS assessing the full environmental consequences of development must be prepared prior to exploration. The decision to approve now and ask questions later is precisely the type of environmentally blind decision-making the National Environmental Policy Act (NEPA) was designed to avoid. Pursuant to the holding in *Conner*, Shell is required to consider the effects of oil production at the exploratory stage.

Referring to the short-term exploratory drilling operation, Shell's DEIS states that any "[i]mpacts that would occur would be insignificant because of their short-term nature and/or their low magnitude of disturbance to the human or natural environment." If oil is discovered, however, the effect on the environment will be severe and long term. DEIS, Page 4-59. The DEIS, however, fails to consider this possibility as required by NEPA.

LG-17

Mr. Robert V. Abbey
Page 2
May 17, 1993

- The DEIS fails to consider the effect of an oil spill during the development stage.

In addition to failing to consider the effect of oil production on the region, the DEIS does not set forth a worst case analysis in the event that an oil spill occurs. In Village of False Pass v. Clark, 733 F.2d 605, 614 (9th Cir. 1984), the court recognized the importance of a worst case analysis where the federal agency would only have one opportunity to consider the potential environmental impacts of leases and their possible exploration, development and production. In cases such as this, where further EIS's will not be required, the effect of a possible oil spill must be considered at the exploratory stage.

- The DEIS does not discuss the potential effects of oil development on the drinking water for the region.

The development of oil may also affect the drinking water in the area. As noted by the court in Phillips Petroleum Co. v. United States E.P.A., 803 F.2d 545, 547 (10th Cir. 1986), energy production companies are using injection techniques to increase production and dispose of unwanted brines brought to the surface during production. A potential oil spill could also have a drastic effect on the water supply of all the residents of Broward County.

The area sought to be used for oil exploration and production is the sole source of drinking water for the Broward County area. As a sole source aquifer, pursuant to the Safe Drinking Water Act the Environmental Protection Agency must also become involved to ensure the protection of the drinking supply of Broward County residents.

If, however, it is determined that the environmental consequences of oil production are not foreseeable or capable of evaluation at the exploratory stage, Sierra Club v. Peterson, 717 F.2d 1409, 1415 (9th Cir. 1983) the federal agency involved is required to retain authority to preclude all activities pending the submission of further information and the authority to prevent proposed activities if the environmental consequences are unacceptable. Pursuant to the holding in Sierra Club, Broward County requests that this agency retain the power to determine the environmental effects if oil is discovered and, if it is determined that the environmental consequences would be substantial, restrict further oil development in the region.

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Mr. Robert V. Abbey
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May 17, 1993

For the foregoing reasons, Broward County objects to the adequacy of the DEIS submitted by Shell. Thank you for the opportunity to comment on this issue.

Very truly yours,

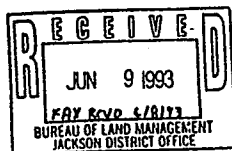
John J. Copelan, Jr.
John J. Copelan, Jr.
County Attorney

JJC\BSM\MA

SG-1



STATE OF FLORIDA
Office of the Governor
THE CAPITOL
TALLAHASSEE, FLORIDA 32399-0001



June 7, 1993

Mr. Robert V. Abbey
District Manager
Bureau of Land Management
411 Briarwood Drive, Suite 404
Jackson, Mississippi 39206

RE: Draft Environmental Impact Statement, Shell Western E&P, Incorporated,
Miccosukee 3-1 Exploratory Well, Miccosukee Indian Reservation, Broward County, Florida

SAI: FL9303170394C

Dear Mr. Abbey:

The State has completed its review of the Draft Environmental Impact Statement for an exploratory hydrocarbon well in Broward County. This review was conducted pursuant to the National Environmental Policy Act and Coastal Zone Act Reauthorization Amendments of 1990. As a part of our review, a meeting was held on May 27, 1993 in which representatives of the numerous reviewing agencies discussed this proposal with federal officials and representatives of the Miccosukee Tribe.

The referenced document does not contain a federal consistency determination for the State's review as required by Coastal Zone Management Act, as amended (15 CFR 930). Such a determination needs to be made.

We find the proposal described in Draft Environmental Impact Statement (DEIS) in conflict with State plans, programs, policies and objectives. The Florida Everglades is not only a fragile and unique ecological system, it is also an integral component of the water supply to the more than 4 million people of southeast Florida and essential to a healthy economic and social structure in South Florida and the Florida Keys. Any threat to the Everglades, and certainly that of oil drilling, is unacceptable because the release of hydrocarbons that might result from human error or natural disaster could be devastating to the environmental, social and economic well-being of Florida.

An oil well in the Everglades would diminish the unique visual characteristics of the region. The proposed well would be located less than a half mile from I-75 and in full view of travelers, many of whom would be gaining their initial impression of Florida's Everglades. Not only would a well degrade the experience of travelers, it would diminish the public's general perception of a natural Everglades. A well in the Everglades could also hurt South Florida's image as a tourist mecca. Not unlike the issue

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Mr. Robert V. Abbey
June 7, 1993
Page 2

of oil and gas drilling off the Florida Keys, drilling in the Everglades is distasteful to the public. Public opposition to this proposal is well documented.

On May 13, 1993, the South Florida Water Management District Governing Board passed Resolution #93, "opposing construction of exploratory wells in, adjacent to and/or under any of the water conservation areas because of the Board's concern for protection of the Everglades ecosystem, the aquifers, water supply sources, and the environment, and the Board's commitment to prevent secondary impacts associated with any production wells." A copy is attached.

The Department of Natural Resources holds that the State has civil regulatory jurisdiction over the on-reservation drilling activity of Shell Western E&P, Incorporated. This determination is based on Section 377.22, Florida Statutes, which provides for the regulation of the exploration, drilling and production of oil and gas and to ensure all precautions are taken to prevent damage including spillage, fires, "blowouts," "caving," "seepage," the intrusion of oil into the aquifer, injury to neighboring properties, etc. (See attached.)

The U.S. Congress, Federal agencies and the State have made commitments to the public to protect and restore the Kissimmee River, Lake Okeechobee, Everglades, Florida Bay and States. This restoration process is underway and millions of dollars of state and federal funds have been committed over the next several years toward the effort. The drilling for oil in this ecosystem is not in accord with goals of restoring and protecting the South Florida ecological system. This DEIS is not in consonance with NEPA goals of enhancing the "quality of the human environment."

The proposed well would be located immediately outside of the State Water Conservation Area 3 (WCA3), and through slant drilling, would terminate under them. We can only conclude that Shell Western intends to explore for oil in the WCA's. A find with this in the WCA's. Since oil drilling cannot be allowed in the WCA's, we see no useful purpose in this proposal.

Florida began an intensive and ambitious program in 1983 to protect and restore the entire Everglades system from the Kissimmee River to Florida Bay. Under the Save Our Everglades Program the U.S. Congress, federal agencies, state and regional agencies, the conservation community and the public have joined hands in a rare showing of unanimity for the common purpose of protecting and restoring the Everglades. Over \$200 million in public funds have gone toward this effort and several times that amount will be required to complete this program. Numerous actions by federal agencies, the state legislature, the

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Mr. Robert V. Abbey
June 7, 1993
Page 3

Florida Cabinet and the Governor have been taken to further this program. This proposal runs counter to all efforts to protect and restore the Everglades.

The BLM would well serve the environment, the public and the Department of the Interior by denying this application, so that Shell Western may expend its energies and resources in a more acceptable manner.

Based on the above findings, this proposal should not go forward, and Shell Western's application should be denied. "No Action" is the only acceptable alternative as provided for in the National Environmental Policy Act and 40 Code of Federal Regulations 1500-1508.

Please contact Estus Whitfield or Don Henningsen at (904)488-8686, if we can be of assistance.

With kind regards, I am

Sincerely,

Lawton Chiles
LAWTON CHILES

LC/djd

Enclosures

cc: Linda Loomis Shelley, Department of Community Affairs
Virginia Weiherell, Department of Environmental Regulation
Don Duden, Department of Natural Resources
Colonel Robert Brantly, Game and Fresh Water Fish Commission
Greg Farmer, Florida Department of Commerce
David Coburn, Governor's Office of Planning and Budgeting
Frank Maloney, Ocean and Coastal Resource Management, NOAA
Tilford Creel, South Florida Water Management District

SG-4



FLORIDA DEPARTMENT OF NATURAL RESOURCES

Marjory Stoneman Douglas Building
3900 Commonwealth Boulevard
Tallahassee, Florida 32399

FL9303170384C

April 6, 1993

Larson Chiles
Governor
Jim Smith
Secretary of State
Bob Butterworth
Attorney General
Cecil Lewis
State Comptroller
Tom Callaghan
State Treasurer
Bob Crawford
Commissioner of Agriculture
Betty Castor
Commissioner of Education

Ms. Janice L. Alcott, Director
State Clearinghouse
Office of Planning and Budgeting
Executive Office of the Governor
The Capitol
Tallahassee, Florida 32399-0001

SUBJECT: Shell's Draft Environmental Impact Statement for
Miccosukee 3-1 Exploratory Well

Dear Ms. Alcott:

Please find attached comments from the Bureau of Geology and the Office of General Counsel regarding the subject SAI.

Thank you for allowing us to comment.

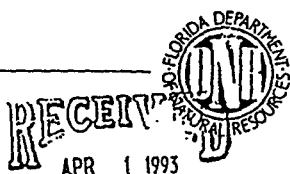
Sincerely,

B. J. White
B. J. White
Environmental Administrator
Office of Policy and Planning

BJW/jp
Attachments

SG-5

MEMORANDUM



RECEIVED
APR 1 1993
Div. of Resource Mgmt.
Dept. of Natural Resources

March 31, 1993

To: Jack Woodard, Assistant Director
Division of Resource Management
From: Walt Schmidt, Chief *Walt*
Bureau of Geology
Subject: Comments regarding Shell's Draft Environmental Impact Statement for their Miccosukee 3-1 Exploratory Well

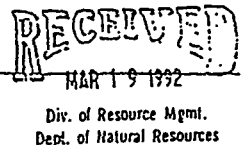
- Shell's proposal generally conforms to the Department's Rules regulating drilling and production of oil and gas in Florida. 50
- Shell did not outline their logging program. In order to better estimate water quality and ensure adequate ground water protection, we recommend that resistivity and porosity logs be run in open hole prior to setting conductor and surface casings. 57
- We have been advised by General Counsel that the Department has jurisdiction to regulate the proposed well. Shell has not yet, however, applied to us for a permit to drill.

WS/dc

Attachments

SG-6

MEMORANDUM



RECEIVED
MAR 19 1992
Div. of Resource Mgmt.
Dept. of Natural Resources

GCO #92-01

March 10, 1992

TO: Jeremy Craft, Director
Division of Resource Management
FROM: Kenneth J. Plante, General Counsel
Office of the Executive Director
RE: Jurisdiction to regulate proposed oil well on Miccosukee Indian Reservation

QUESTION:

Whether the State of Florida, Department of Natural Resources, has jurisdiction, pursuant to Chapter 377, Florida Statutes, and the rules promulgated thereunder, to regulate drilling for oil and natural gas on the Miccosukee Indian reservation by Shell Western, a private, non-Indian corporation?

SUMMARY OF ANSWER:

47 Yes. The State of Florida, Department of Natural Resources, has civil regulatory jurisdiction over the on-reservation drilling activity of Shell Western.

ANALYSIS: The test for determining if state jurisdiction applies over the conduct of non-Indians engaged in on-reservation activities is whether such application represents an unlawful infringement on tribal self-government or is pre-empted by federal law. *Mescalero Apache Tribe v. Jones*, 411 U.S. 145 (1973). My research has not revealed any cases with an identical fact situation to that under consideration. However, the United States Supreme Court has examined numerous cases regarding the application of state law to non-Indians on Indian reservations in the context of taxation, licensing, hunting and fishing.

There is no rigid rule to determine whether a particular state law may be applied on an Indian reservation, rather, the United States Supreme Court has repeatedly employed a flexible analysis sensitive to the particular facts and legislation involved. In each case, the Court performed a particularized examination of the

SG-7

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relevant state, federal and tribal interests. Cotton Petroleum Corporation v. New Mexico, 104 L.Ed. 2d 209 (1988). In its analysis, the Court has considered the following: 1) whether the state asserted a legitimate regulatory interest; 2) upon whom the burden of the regulation fell; and 3) whether federal law imposed a comprehensive regulatory scheme thus pre-empting the area. For example, in White Mountain v. Bracker, 65 L.Ed. 2d 665 (1980), the Court addressed the question of whether Arizona could impose its license tax and use fuel tax on a non-Indian logging company's use of Indian reservation roads. In assessing the relevant interests, the Court found that Arizona was unable to identify any regulatory function or service it performed that would justify the assessment of taxes for activities on tribal roads, in that the roads were built, maintained and policed exclusively by the federal government and the tribe. Bracker, at 677. The Court determined it was undisputed that the economic burden of the asserted taxes would ultimately fall on the tribe. Id. at 677-678. Moreover, the Court concluded that the taxes would undermine federal policy in that the federal government had undertaken to regulate the most minute details of the tribe's timber operations. Id. at 674-676. Thus, the Court held that imposition of the state taxes on the logging company was pre-empted by federal law. Id. at 669.

Similarly, in the case of Ramah Nevejo School Board, Inc. v. Bureau of Revenue of New Mexico, 458 U.S. 832 (1982), the Court held that New Mexico was precluded from imposing taxes on two non-Indian construction companies hired to build a school on Indian reservation property. As in Bracker, the Court found that New Mexico had no legitimate regulatory interest that would justify the tax because the state declined to take any responsibility for the education of Indian children and thus was uninvolved in the on-reservation activity. Ramah at 843-846. Also, as in Bracker, the Court concluded that no economic burden fell on the tribe by virtue of the state tax. Id. at 839. Finally, the Court found that the federal law imposed an exclusive regulatory scheme for the provision of education on the reservation and thus the taxes were pre-empted by federal law. Id. at 840-842.

Unlike the outcome of Bracker and Ramah, in Cotton Petroleum Corporation v. New Mexico, 104 L.Ed. 2d 209 (1988), the Court upheld the state's right to impose taxes on the production of oil and gas by non-Indians on reservation property. The Court concluded that the state tax was not pre-empted by federal law and did not unlawfully infringe on tribal self-government. Id. at 232-234. In making its decision, the Court found that New Mexico provided substantial services to both the tribe and the lessee which justified the tax. Id. at 233. The Court also determined that the tax imposed no economic burden on the tribe and that federal and tribal regulation was not exclusive, since the state regulated many aspects of the on-reservation drilling activities. Id. Even though it was reasonable to infer that the New Mexico taxes would have a marginal effect on the demand for on-reservation

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leases, the Court concluded that any impairment that might be caused by the taxes was simply too indirect and insubstantial to support a claim of pre-emption. Id. The Court stated that absent some special factors such as those present in Bracker and Ramah, the indirect burdens associated with the state taxes were insufficient to find that the taxes unduly interfered with reservation self-government or were pre-empted by federal law. Id. at 233-234.

In applying the criteria used in Cotton, White Mountain and Bracker to the facts herein, I cannot conclude that the application of Florida's regulations to the on-reservation drilling activity by Shell Western, a non-Indian corporation, would interfere with reservation self-government or is pre-empted by federal law. Chapter 377, Florida Statutes, vests the State of Florida, Department of Natural Resources with regulatory authority over exploration and drilling for oil and natural gas within the State. The application of Chapter 377, Florida Statutes, to Shell Western would be in accord with the State's "legitimate interest in regulating the affairs of non-Indians." McGlenahan v. State Tax Commission at Arizona, 411 U.S. 164 (1973).

In balancing the federal, Indian, and state interests herein, Florida's interest in regulating drilling activity is significant. The policy of the State of Florida concerning the regulation of oil and gas drilling is to conserve and control the State's natural resources and to prevent their waste, and to safeguard the health, property and public welfare of the citizens of the State. § 377.06, Fla. Stat. The State has assumed the responsibility pursuant to Chapter 377, Florida Statutes, to regulate the exploration, drilling and production of oil and gas to ensure that all precautions are taken to prevent damage including spillage, fires, "blowouts", "caving", "seepage", the intrusion of oil into the aquifer, injury to neighboring properties, etc. See § 377.22, Fla. Stat. The United States Supreme Court has said that a state's regulatory interest will be particularly substantial if the state can point to off-reservation effects that necessitate state intervention. New Mexico v. Mescalero, 462 U.S. 324 (1983). Even assuming that Shell Western's drilling activity will be located entirely on reservation property, there will clearly be substantial off-reservation effects from the production and distribution of the oil and gas which would warrant state intervention. A contrary conclusion would extend the exercise of tribal power beyond what is necessary to protect tribal self-government. See State of Montana v. United States, 450 U.S. 544 (1981).

The ultimate burden of the regulation herein will not fall upon the Miccosukee Indians (the "Tribe"). The burden of adhering to the State's rules and regulations under Chapter 377, Florida Statutes, will fall upon Shell Western as it proceeds with its exploration and drilling activities. As found by the United States Supreme Court in Cotton, although the regulation may have a

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marginal effect on the appeal of the on-reservation lease, the possible impairment is too indirect and insubstantial to support a claim of pre-emption. Further, my examination of federal law fails to reveal any evidence that the federal government intended to pre-empt the states from regulating activities associated with the exploration and drilling for oil and natural gas. The federal government has no comprehensive scheme for regulating such activities, but rather, has left this area of regulation to the individual states. In conclusion, I am of the opinion that Florida may exercise civil regulatory jurisdiction over the drilling activity of Shell Western on the Miccosukee Indian reservation.

For purposes of this opinion, I assumed that both the well and bottom hole of Shell Western's proposed drilling will be located on the Miccosukee Indian reservation. If the well and bottom hole are located on the original reservation land, the Tribe has subsurface rights pursuant to Deed dated March 30, 1966 and does not need authorization to lease the subject property for the purposes of drilling. If the well and bottom hole are located on the "Leased Area" of the reservation, the Tribe does not have subsurface rights, pursuant to the 1982 Lease Agreement, and the Tribe would need to get authorization to lease the property from the Board of Trustees. If, in fact, the bottom hole is not located on reservation land, the State would have jurisdiction to regulate the drilling pursuant to Chapter 377, Florida Statutes. Any drilling conducted without authorization from the owner of the subsurface rights could constitute the basis for a claim of trespass.

Of final note, a press release issued by the Tribe, describing Shell Western's activities on the reservation, says that the Tribe's reservation lands are not subject to State civil regulatory jurisdiction and that as a result of the 1982 Florida Indian Claims Settlement Agreement, the State granted the Tribe the right to utilize the subsurface of the reservation free of State regulatory control. I have found no authority in the Settlement Agreement, the Lease Agreement, or applicable legislation supporting the Tribe's contention that the State of Florida waived its right to regulate use of the subsurface of the Miccosukee Indian reservation.

Prepared by:
Lanette M. Price
Assistant General Counsel

4



South Florida Water Management District

3301 Gun Club Road • P.O. Box 24680 • West Palm Beach, FL 33416-4680 • (407) 686-8800 • FL WATS 1-800-432-2045
GOV 02-16-03

May 19, 1993

Bruce Babbitt, Secretary
Department of the Interior
1849 C Street NW
Washington, D.C. 20240

RECEIVED
JUN 9 1993

Office of
Environmental Affairs

Dear Mr. Secretary:

46

On May 13 the Governing Board of the South Florida Water Management District adopted Resolution 93-18 opposing the construction of exploratory oil wells in, adjacent to, or under any Water Conservation Area within the Everglades. This was prompted by the pending application of Shell Western E & P Inc. to drill in the Everglades.

Attached is a copy of the resolution. The Board's concerns include possible contamination of the aquifers which are the source of water for millions of residents; the potential threat to fish, wildlife and the environment; and conceivably the interruption of sheetflow to Everglades National Park.

As the entity whose responsibilities include preservation and restoration of the Everglades, the Governing Board is committed to preventing any further degradation and to protecting and improving the remaining two million acres that comprise the Everglades.

It is our understanding that the final decision in such matters rests with the Bureau of Land Management. We ask that you make every effort to see that any Application for Permit to Drill (APD) in, adjacent to or under any Everglades Water Conservation Area is rejected.

We look forward to working cooperatively with the Department of Interior and all parties interested in Everglades protection and enhancement.

Sincerely,

Valerie Boyd
Valerie Boyd
Chairman

VB/vvv

Governing Board:
Valerie Boyd, Chairman
Frank Williamson, Jr., Vice Chairman
Janie Rasmussen

William Hammond
Betty Krant
Eugene H. Pettis
Nathaniel P. Reed

Tifford C. Crest, Executive Director
Thomas K. AlacVicar, Deputy Executive Director

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SG-12

SOUTH FLORIDA WATERMANAGEMENT DISTRICT

RESOLUTION NO. 93-18

A RESOLUTION BY THE GOVERNING BOARD OF THE SOUTH FLORIDA WATER MANAGEMENT DISTRICT OPPOSING CONSTRUCTION OF EXPLORATORY OIL WELLS IN, ADJACENT TO, OR UNDER ANY EVERGLADES WATER CONSERVATION AREAS.

WHEREAS, Over the past few months the issue of oil exploration in and around the water conservation areas has been discussed and the SFWMD has presented formal written comments to the Bureau of Land Management on this issue; and

WHEREAS, The Governing Board is against the use of the District's property for access or transportation facilities that may be required for this use; and

WHEREAS, The exploratory well and any subsequent production wells will pierce aquifers in the region which include the surficial aquifer system (consisting of the water table and lower tamiami aquifers which contain fresh and brackish quality water used for drinking and irrigation purposes); at greater depths, the well will penetrate the producing zones of the upper and middle Floridan aquifer system (these zones contain brackish water used for reverse osmosis and ASR production purposes); the well, if constructed will pierce the lower Floridan which is used extensively for disposal of waste waters in south Florida; and

WHEREAS, The Governing Board is concerned about the protection against oil-related contamination of South Florida's water resources; and

WHEREAS, The Governing Board is concerned for the protection of fish, wildlife, and their habitat; and

WHEREAS, The Governing Board is concerned about the potential interruption of sheetflow to the Everglades National Park if contamination occurs; and

WHEREAS, The Governing Board is concerned that this use will be in conflict with the Everglades restoration efforts and the significant public and private investments toward Everglades Restoration; and

WHEREAS, The Governing Board is concerned that an improperly abandoned exploratory well could impact the water resources through vertical contamination between aquifers; and

WHEREAS, The Governing Board has an overall concern for the environmental and public health threats posed by oil wells existing in this unique and vitally important area of Florida.

NOW THEREFORE, BE IT RESOLVED that the Governing Board of the SFWMD:

Opposes construction of exploratory oil wells in, adjacent to and/or under any of the water conservation areas because of the Board's concern for protection of the Everglades ecosystem, the aquifers, water supply sources; and the environment, and the Board's commitment to prevent secondary impacts associated with any production wells.

PASSED AND ADOPTED this 13th day of May, A.D., 1993.



SOUTH FLORIDA WATERMANAGEMENT DISTRICT BY ITS GOVERNING BOARD

By: Valerie Bayl
Chairman

ATTEST
By: Tom Binn
Assistant Secretary

APPROVED:

Thomas R. Wolfe
Office of Counsel

SG-13

SG-14

10A THE MIAMI HERALD, MONDAY, MAY 17, 1993

The Miami Herald

JOHN S. KNIGHT (1894-1961) JAMES L. KNIGHT (1909-1991)
DAVID LAWRENCE JR., Publisher and Chairman
ROBERTO SUAREZ President
JIM HAMPTON Editor
MARTHA MUSGROVE and TONY PROSCIO Associate Editors
SAUNDRA KEYES Managing Editor
DOUGLAS C. CLIFTON Executive Editor
PETE WEITZEL Senior Managing Editor

Oil in our water? No way!

U.S. INTERIOR Secretary Bruce Babbitt says that he wants to avoid "train wrecks," but there's a doozy headed his way. It's the application of Shell Oil Co. and the Miccosukee Indian tribe to drill an exploratory oil well under Conservation Area Three in South Florida. The conservation areas are marshy reservoirs, vital to the water supply of four million urban South Floridians. Conservation Area Three also feeds water directly into Everglades National Park and is the focus of an anti-pollution lawsuit brought by the National Park Service and U.S. Fish and Wildlife Service against the state and South Florida Water Management District. The water district has successfully prohibited other private landowners from drilling or mining in the conservation areas. So its managers understandably were stunned that Interior's Bureau of Land Management and the Bureau of Indian Affairs might permit oil drilling on the Miccosukee reservation, adjacent to and underlying parts of the conservation area. Prodded by Fort Lauderdale member Betsy Krant, the district governing board last week added its unanimous objection to South Florida's growing chorus of complaints. Earlier clamor forced the BLM to order an environmental impact statement.

STOP INDIANS' TEST WELL

That slowed but didn't stop "the train." It would be incongruous to issue the permits. The impact statement does ensure, in its words, "enforceable mitigation measures, if such are found to be required..." There should be no if. In fact, there should be no permit. The impact statement acknowledges — even as it tries to minimize — that drilling is fraught with risks. Absolutely chilling is the statement's contradictory summary of impact on water resources: "No significant impact to water resources is expected. Construction and operation of the access road could contribute to minor increased sediment input to canals which parallel its route. The potential exists for contamination of surface water by spilled fuels, lubricants, hydraulic fluids, and oil which may be obtained during production testing. Local freshwater aquifers may be contaminated by leakage of drilling fluids or produced oil and by mixing groundwater between aquifers..." Shell's corporate policies and federal regulatory restrictions will "greatly reduce the probability" of damage, it adds. Avoid this train wreck, Secretary Babbitt. Sidetrack this permit — now.



Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400
Lawson Chiles, Governor
Virginia B. Wetherell, Secretary

June 1, 1993

David Coburn, Director
Office of Planning and Budgeting
Executive Office of the Governor
The Capitol
Tallahassee, Florida 32399-0001

Dear Mr. Coburn:

Re: Draft Environmental Impact Statement
Shell Western E&P, Inc., Broward County
SAI FL9303170384C

We have reviewed the referenced document in which Shell Western proposes to drill an exploration well on the Miccosukee Indian Reservation in Broward County. Based on the information provided in the draft environmental impact statement (DEIS), the Department's regulatory interests in the exploration project by itself appear to be limited. The drill site is not located in wetlands and the drilling plan proposes no discharges to surface waters. The Department may wish to participate in a review for compliance with applicable air quality regulations.

Our greater concern is for those environmental impacts beyond the scope of proposed exploration activities. Such impacts would be associated with development and production activities; accidental releases of oil, brines, or other contaminated liquid wastes; or accidental emissions of airborne contaminants.

Development and production is expected to result in extensive filling of wetland areas to construct drillsites, access roads, pipelines, and related facilities. Shell Western representatives have disclosed that it may locate a production drillsite in water conservation area 3A. Greater levels of air emissions and surface and groundwater discharges will accompany production operations and may contribute to the degradation of air and water quality over a wide area.

SG-15

JUN-87 93 13:47 ID:DER TALLAHASSEE TEL NO:904-488-8579 HS40 P82

Mr. David Coburn
June 1, 1993
Page Two

The risk of accidental discharges and emissions during exploration and production is a paramount concern due to the location of the drillsite adjacent to the water conservation area and within the Everglades ecosystem. An accidental discharge of oil or other contaminated waste could cause extensive damage to area resources, including the irreplaceable loss of critical water supplies.

It is inappropriate for the DEIS to evaluate exploration activities without considering the full range of impacts associated with development and production. Production activities are closely linked and causally related to exploration, particularly where there is a high probability of encountering oil-bearing zones. A successful exploration at the Shell Western drillsite is reasonably foreseeable since producible quantities of oil have been found at numerous locations in the Sunniland Trend. The acceptability of conducting development and production operations at this location should be considered in making the threshold decision to conduct exploration. We request that the DEIS be revised to include development and production activities as cumulative and secondary impacts of exploration.

The direct and cumulative impacts of this project may result in significant adverse effects on land and water uses in the state's coastal zone. Any such activities should be evaluated for consistency with the Florida Coastal Management Program. Shell Western should provide a consistency certification to the state and the Bureau of Land Management in accordance with the procedures laid out in 15 CFR 930, Subpart D.

We appreciate the opportunity to review this document and to discuss the project with Shell Western representatives. If there are any questions concerning these comments please contact Lynn Griffin at 488-0784.

Sincerely,

Virginia B. Wetherell
Virginia B. Wetherell
Secretary

SG-16

FLORIDA DEPARTMENT OF TRANSPORTATION
780 Southwest 24 Street
Fort Lauderdale, Florida 33315-2696
Telephone: (305) 524-8621

April 10, 1993

Ms. Janice L. Alcott, Director
State Clearinghouse
Office of Planning and Budgeting
Budget Management and Planning Policy Unit
Executive Office of the Governor
Room 411, Carlton Building
Tallahassee, Florida 32399-0001

Subject: Shell Western E & P Inc. Miccosukee 3-1
Exploration Well, Broward Co. FL.
SIA No. FL9303170384C

Copy: Sandra Whitmire

Dear Ms. Alcott:

Based upon the information provided, we find the subject project to have no impact on the State Transportation System. The project has been reviewed under Presidential Executive Order 12372 and the Florida Coastal Zone Management Program for consistency with only the following plans and policies:

* Intergovernmental Coordination

Based upon our review, we have the following comment related to this project.

* I-75 is a limited access Interstate. Reasonable access to this project appears to be provided by the I-75 interchange at Snake Road. Both transportation access alternatives A and B make use of this interchange and would be the desirable route of entry.

A re-evaluation of this project will be conducted during the environmental documentation or permitting stage, if required. Future consistency of this project will be based in part on adequate consideration of comments offered in this and subsequent reviews.

If you have any questions regarding this response, please contact Ana Gannon at (305) 797-1750.

Sincerely,

Ana Gannon
Ana Gannon
Environmental Administrator

SG-17

04/21/1993 07:33 BUR. OF ECONOMIC ANALYSIS 904 487 3814 P.07



STATE OF FLORIDA DEPARTMENT OF COMMERCE

April 15, 1993

Division of Economic Development

Ms. Janice Alcott
State Clearinghouse
Room 411, Carlton Building
Tallahassee, FL 32399-0001

RECEIVED
APR 21 1993

STATE CLEARINGHOUSE

Dear Ms. Alcott:

We have reviewed the above-referenced SAI--a draft environmental impact statement (DEIS)--which analyzes the impacts of the Shell Western E&P Inc. proposal to drill an exploratory well and test the potential hydrocarbon bearing formations at a site located on the Miccosukee Indian Reservation in Broward County. The Bureau of Land Management, Bureau of Indian Affairs, and the U.S. Geological Survey, Water Resources Division are participating in the DEIS.

It is our understanding that the hydrocarbon rights on the Miccosukee Indian Reservation were leased to Shell Western by the Miccosukee Tribe on July 20, 1989, through a lease agreement approved by the Bureau of Indian Affairs. The Miccosukee Indian Reservation may derive economic opportunities from the drilling proposal which will take place entirely within Tribal Lands. Any revenues generated from activities and development on the reservation play a role in helping the Miccosukee Tribe achieve self-sufficiency. A stipulation in the lease provides that "... if there is a conflict between the various State, Federal or tribal regulations, rules, laws or orders, Shell Western shall comply with the more stringent regulation, rule, law or order ..."

We are aware that substantial public concern has been expressed regarding the proposal due to the sensitivity of the Everglades and Big Cypress Swamp environments and associated natural resources, specifically the Biscayne aquifer. If the state agencies with responsibility for managing and protecting the state's environment find merit to these public concerns, we are confident that the stipulation in the lease agreement will ensure that these concerns are addressed.

This project is consistent with the Department's long-term goals and policies to promote economic development in economically distressed areas in Florida without lessening our environmental permitting standards. Thank you for the opportunity to comment on this SAI.

Sincerely,

Wynelle Wilson
Wynelle Wilson
Economist Supervisor

WW/asc

SG-18



FLORIDA DEPARTMENT OF STATE
Jim Smith
Secretary of State

DIVISION OF HISTORICAL RESOURCES

R.A. Gray Building
500 South Bronough
Tallahassee, Florida 32399-0250

Director's Office Tel/copier Number (FAX)
(904) 488-1480 (904) 488-3353

April 5, 1993

Ms. Janice L. Alcott, Director
State Clearinghouse
Executive Office of the Governor-OPB
Room 411, Carlton Building
Tallahassee, Florida 32399-0001

In Reply Refer To:
Denise M. Breit
Historic Sites
Specialist
(904) 487-2333
Project File No. 930817

RE: Cultural Resource Assessment Request
SAI# FL9303170384C
Draft Environmental Impact Statement (DEIS) for the Shell Western E&P Inc. Miccosukee 3-1 Exploratory Well, Miccosukee Indian Reservation Broward County, Florida

Dear Ms. Alcott:

In accordance with the provisions of Florida's Coastal Zone Management Act and Chapter 267, Florida Statutes, as well as the procedures contained in 36 C.F.R., Part 800 ("Protection of Historic Properties"), we have reviewed the referenced project(s) for possible impact to historic properties listed, or eligible for listing, in the National Register of Historic Places, or otherwise of historical or architectural value.

We have reviewed the DEIS and note that Sections 3.3.2, 4.3.2, and 4.4.2 adequately address this agency's historic preservation concerns. In addition, a review of our files indicates that no significant archaeological sites are likely to occur within the proposed drill site or as a result of Alternative A or Alternative C. Project activities associated with the above will have no effect on properties potentially eligible for listing in the National Register, or otherwise of historical or architectural value. These portions of the project are also consistent with the historic preservation laws of Florida's Coastal Management Program and may proceed.

Concerning Alternative B, a potentially significant archaeological site, 8BD1439, is recorded in the vicinity of Access Route B. This site should be avoided and preserved. If this is not feasible, professional Phase II testing will need to be performed at the location of this site prior to any project related ground disturbing activities. The resultant final report

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Ms. Alcott
April 5, 1993
Page 2

would then need to be forwarded to this office in order to complete the project review process.

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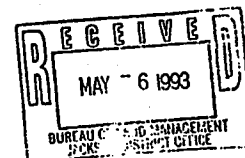
If you have any questions concerning our comments, please do not hesitate to contact us. Your interest in protecting Florida's historic properties is appreciated.

Sincerely,

George W. Percy
George W. Percy, Director
Division of Historical Resources
and
State Historic Preservation Officer

GWP/Bdb
xc: Robert V. Abbey

South
Florida
Regional
Planning
Council



May 3, 1993

Mr. Robert V. Abbey, District Manager
Bureau of Land Management
United States Department of the Interior
411 Briarwood Drive, Suite 404
Jackson, Mississippi 39206

Dear Mr. Abbey:

The Council has had an opportunity to review the Draft Environmental Impact Statement pertaining to exploratory oil drilling activity in the extreme western portion of Broward County. The purpose of this letter is to express to you the Council's concern regarding this proposed activity. The general context of the Council's concern is that the site of the proposed drilling is located within the Water Conservation Area and in the heart of headwaters of the Everglades and Big Cypress Swamp environments. As you can see, there is a truly regional implication to this proposal as the potential exists for cross-ecosystem and cross-county impacts.

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It is fair to say that the Council's concern with this exploratory phase of the project is significantly heightened with the prospect of future extraction of oil and gas products in this location of the Region. To this point, the Draft Environmental Impact Statement does not address potential impacts associated with extraction which appears to be a gross oversight. In addition, the document assumes a need for exploratory drilling by severely discounting the "no-action" alternative. Contention has arisen from information contained in the document regarding several critical issues including the proximity of the Biscayne Aquifer to the proposed drilling site and the degree of connectedness of various drainage channels, basins and sub-basins. Furthermore, the credibility of the analysis is called into question by a reliance on hydrologic data from a period widely recognized as an extended drought which affected the Region from 1988-90.

I trust that the above issues will be thoroughly addressed as the Environmental Impact Statement is further processed. There exists, however, an overwhelming concern regarding the potential for adverse impacts associated with the prospect of drilling for oil in this location that makes this proposal difficult to accept. The Everglades ecosystem and downstream resources including Florida Bay, the Florida Keys and offshore coral reef are treasures of national as well as global significance which should not be subjected to the risks of such major sources of contamination. The Biscayne Aquifer, which has been designated by the federal government as a sole source aquifer and serves as the primary water supply for approximately four million people, cannot be jeopardized. To better understand these relationships, the true cost of potential impacts to the Region's resources including wildlife, the water supply and tourism must be thoroughly examined.

3440 Hollywood Boulevard, Suite #140, Hollywood, Florida 33021
Broward (305) 961-2999, Dade (305) 620-4266, FAX (305) 961-0322

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Mr. Robert V. Abbey, District Manager
May 3, 1993
Page 2

Finally, this proposal has every appearance of running counter to many of the efforts which the Council has supported over the years. To illustrate, policies contained in the Regional Plan for South Florida include the following:

- 8.1.19 Encourage and assist in increasing coordination between water management programs and land use planning efforts to ensure the long-range maintenance, allocation, and enhancement of the Region's water resources.
- 8.1.22 The state, South Florida Water Management District and local governments shall protect the water supply for the Everglades National Park, state park lands, and other environmentally significant areas.
- 10.2.4 The initiatives of the Save Our Everglades, Save our Keys, the East Everglades Resource Planning and Management Committee Implementation, Lake Okeechobee Everglades and Biscayne Bay SWIM plans and other resource protection plans shall be considered in land and water planning by local regional and state agencies.
- 14.1.9 Identify and protect areas suitable for mining in the Region. These areas will be limited to those containing prime resource deposits and exclude environmentally sensitive areas.

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The Council appreciates the opportunity to review the Draft Environmental Impact Statement and will remain an active participant as the process continues. If you have any questions or if you feel that the Council can be of assistance, please call me at (305) 357-7003 or Carolyn Dekle, the Council's Executive Director at (305) 961-2999.

John P. Hart
John P. Hart
Chairman

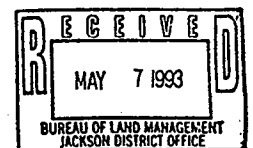


South Florida Water Management District

3301 Gun Club Road • P.O. Box 24680 • West Palm Beach, FL 33418-4680 • (407) 686-8800 • FL WATS 1-800-432-2045

April 30, 1993

Mr. Robert V. Abbey
District Manager
Bureau of Land Management
411 Briarwood Drive, Suite 404
Jackson, MS 39206



Dear Mr. Abbey:

The South Florida Water Management District has completed its review of the Draft Environmental Impact Statement for the SWEPI Miccosukee 3-1 Exploratory Well proposed for the Miccosukee Indian Reservation in Broward County, Florida. Based on the information provided in this document, we have the following questions and concerns:

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- 1) The reason given for not conducting direct drilling to the target well head (which would place the rig within WCA-3A) is "due to the nature of the well as a wildcat exploratory well". What is meant by this phrase? Would this then mean that if the well is successful, SWEPI will be looking at placing wells within the WCA?
- 2) Please clarify on what basis production from a single well and well field development were determined not to be reasonably foreseeable actions (which would require that they be addressed in this EIS). This appears to contradict the purpose of a wildcat exploratory well which is to look for exploitable resources of oil.
- 3) The draft EIS needs to specify what level of environmental analysis would be required to allow single well production and/or well field development. The time frames and opportunities for comment will differ if these actions can be addressed in a supplement to the existing EIS versus conducting a new EIS.
- 4) The access routes proposed in Alternative C uses a portion of the L-28 right of way and it appears that Alternative A would also use a portion of the right of way. While the District does authorize temporary use of its rights of way for permitting criteria, the District is extremely concerned about any use of the right-of-way that may have adverse impacts on our levees, berms and the adjacent canal. It is requested that the applicant consult with the District to determine the extent of the right-of-way encroachment, whether other alternatives are available, and, if appropriate, submit an application for a permit.
- 5) Under the assessment of noise impacts on wildlife, the study fails to address the timing of noise disturbances during wading bird breeding periods.

Governing Board:
Valerie Boyd, Chairman
Frank Williamson, Jr., Vice Chairman
Annie Betancourt

William Hammond
Betty Krant
Allan Milledge

Eugene K. Petris
Nathaniel P. Reed
Leah G. Schaid

Tifford C. Creel, Executive Director
Thomas K. MacVicar, Deputy Executive Director

SG-23

T-1

Dr. Robert Abbey
April 30, 1993
Page Two

In addition to the above comments, the Miccosukee Tribe has stated that SWEPI will conform to the more stringent environmental standards, federal, state or local. Therefore, The District will continue to evaluate the drilling protocols and on-site storm water containment systems to insure they meet District standards.

Thank you for this opportunity to comment on the Draft EIS. We look forward to seeing our concerns addressed in the Final EIS.

Sincerely,

John G. Dempsey
John G. Dempsey, Ph.D.
Assistant Executive Director
Water Resources Management

STATEMENT OF
THE MICCOSUKEE TRIBE OF INDIANS OF FLORIDA
CONCERNING THE
ENVIRONMENTAL IMPACT STATEMENT
PREPARED FOR THE
BUREAU OF LAND MANAGEMENT AND BUREAU OF INDIAN AFFAIRS
REGARDING THE SHELL WESTERN DRILLING PERMIT APPLICATION

April 14, 1995

The Miccosukee Tribe of Indians of Florida is pleased that the draft of the Environmental Impact Statement (EIS) regarding possible drilling on the Miccosukee Federal Reservation has been completed and is now available for public comment. We hope our South Florida neighbors will carefully review this document, and offer responsible comment about it and the process by which it was produced.

The Miccosukee Tribe's decision to determine whether its Reservation has mineral potential has been the subject of some measure of opposition by members of the public. One of the fears that has been expressed concerns whether such activity would harm the Everglades ecosystem. The Tribe must emphasize again its firmly established policy that any activity conducted on its Reservation may proceed only in an environmentally sound manner. The Tribe required that its lessee, Shell Western, design a plan that complies fully with all applicable environmental laws and regulations, and has encouraged, indeed, demanded, that the federal regulatory agencies strictly enforce these requirements. The EIS evaluates the plans in detail and measures them against the legal requirements, and concludes that there will be no significant adverse impacts. We hope everyone will read this analysis.

A fear was also expressed that the proposed project could endanger the underground aquifer that supplies drinking water to southeast Florida. The EIS reveals that this aquifer lies several miles to the east of the drilling target, and, therefore, will not be impacted.

The Miccosukee Indians, as much as, if not more than, any other citizens of Florida, treasure the Everglades. It has been our homeland for generations. This exploratory well is in a cow pasture in a fringe area of the Everglades. Some areas of our Reservation have been victimized by the pollutants introduced north of us, and we are actively engaged in efforts to stop this contamination and restore the quality of our water resources. We are committed to this effort. And we can assure all of our neighbors that this commitment extends to making certain that any drilling activities that the federal authorities may permit shall be carried out in strict and total compliance with federal requirements.

The Miccosukee Tribe's Reservation is small - particularly when compared with the vast area of Florida our ancestors occupied. Thus, we must make maximum use of the land base we have. Our decision to look for mineral resources is not new to South Florida. Exploration for oil has been going on there for more than 40 years, and oil production goes on there today.

If we have mineral resources, we want to use them to help improve the health, housing and education of the Miccosukee people. The Tribe has a legal right to do so. We are, however, keenly aware of our responsibility to act at all times in a prudent manner that will not harm our people, our neighbors or our homeland.

FG-1

FG-2



United States Department of the Interior

BUREAU OF MINES
Intermountain Field Operations Center
P.O. Box 25086
Building 20, Denver Federal Center
Denver, Colorado 80225



March 24, 1993

Memorandum

To: Robert V. Abbey, District Manager, Bureau of Land Management, 411 Briarwood Drive, Suite 404, Jackson, Mississippi 39206

From: Supervisory Physical Scientist, Intermountain Field Operations Center

Subject: Review of Draft Environmental Impact Statement, Shell Western E & P Inc. Miccosukee 3-1 Exploratory Well, Miccosukee Indian Reservation, Broward County, Florida

As you requested, personnel of the Bureau of Mines reviewed the subject document to determine whether mineral resources or mineral-production facilities would be adversely impacted by the proposed project. The draft EIS pertains to a proposal by Shell Western E & P Inc. to drill a 17,730 foot, true depth, hydrocarbon exploratory well on the Miccosukee Indian Reservation in Broward County, Florida.

The area is underlain by the Fort Thompson Formation, an alternating series of fresh water and marine marls and limestones. One crushed limestone operation on the west side of Miami is mining the Fort Thompson Formation in conjunction with another limestone unit. In the vicinity of the Miccosukee Indian Reservation the Fort Thompson Formation has a maximum thickness of about 20 feet and an average thickness of about 10 feet and may have potential for use as secondary road base material.

A review of library and file data pertaining to southeastern Florida indicates that the project, as proposed, would have no impact on known mineral resources or mineral-production facilities.

Owing to the nature of the project and the fact that we have no record of mineral resources, other than the Fort Thompson Formation, in the immediate project area, we believe the document is adequate with regard to minerals. We have no objection to the project as proposed or the document as presented.

Mark H. Hibpshman
Mark H. Hibpshman

dhw/cv

FG-3

FG-4

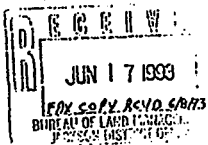


UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET, N.E.
ATLANTA, GEORGIA 30365

JUN 07 1993



Robert V. Abbey
District Manager
Bureau of Land Management
411 Briarwood Drive, Suite 404
Jackson, Mississippi 39206

RE: Draft Environmental Impact Statement (EIS), Shell Western
E&P Inc., Miccosukee 3-1 Exploration Well, Miccosukee
Indian Reservation, Broward County, Florida

Dear Mr. Abbey:

The Environmental Protection Agency Region IV (EPA) has reviewed the referenced Draft EIS. This review was conducted in accordance with EPA's responsibilities under Section 309 of the Clean Air Act and Section 102 (2)(C) of NEPA. The Draft EIS analyzes impacts of siting and drilling an exploratory well and testing the potential hydrocarbon bearing formations at a site located on Reservation land at the junction of I-75 and Canal/Levee L-28.

Include Production Well Impacts in the EIS
We appreciate BLM's position in not wanting to prepare documentation of impacts from full oil field production at this preliminary exploration stage of this project, and we acknowledge the Appendix A-1 information pertaining to oil well and field development. We are encouraged by BLM's stated commitment to prepare additional NEPA documentation in the event that the exploratory well data indicates full field production is warranted. Nonetheless, we believe the EIS document should place before the public the entire spectrum of potential impacts from the project, including the drilling of oil production wells and environmental impacts associated with full field production. An applicant does not drill an exploratory well without reasonable expectations of discovering recoverable petroleum resources, and these expectations are supported by the presence of other producing wells located nearby. Raccoon Point, a producing wellfield comprising 17 wells and five pads, is located approximately fifteen miles south of the proposed SWEPT Miccosukee 3-1 well.

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Since the purpose of exploratory drilling is to identify probable resources accessible only by the installation of production wells, exploratory drilling and installation of production wells could be viewed as connected actions, and therefore part of the project's scope which should be discussed in the same impact statement. Certainly, oil exploration and oil production may be considered as similar actions, which when viewed with other reasonably foreseeable or proposed agency actions, have similarities that provide a basis for evaluating their environmental consequences together.

Road Construction

The preferred alternative (Alternative A) requires modifying an existing berm system such that the load bearing capacity of the berm is strengthened to support the weight and traffic of drill rig equipment. Because this berm road will be only 15 feet wide, additional areas (turnouts) need be built to allow passage of two oncoming vehicles/equipment. The Draft EIS should contain more specific details of the required road construction such as estimates of volume of crushed rock aggregate needed to strengthen the berm, and whether the widening of the berm is expected to encroach into any wetland or upland hammock areas.

1

Turnout Construction

We estimate that 2.9 - 4.4 acres will be filled to construct 7 - 11 turnouts (each turnout has a footprint of about 0.4 acres). We propose that Table 2-1 be modified to reflect this acreage. Turnouts should be located so as to avoid hammocks, tree islands, willow heads and marsh areas.

2

Alternative B Impacts

The preferred Alternative would require an easement for access to the L-28 Canal and Levee system from South Florida Water Management District (SFWMD). In the event that SFWMD is unable to provide the applicant an easement to their levee system, or if using the Levee as a roadbed is determined to be technically unfeasible, an alternative access route would be needed. Because Alternative B - a route from the Snake Road Amoco Station east to the well site - would avoid the levee system, we encourage the applicant to provide more specific details of the road construction, impacts on 404 jurisdictional wetlands, and proposed mitigation for wetland impacts for Alternative B.

3

Cultural Resources

The Archaeological Review Assessment (Appendix 4-A) reported no cultural resources at the drill site but did not specifically address the hammock/tree island areas located west of L-28 which may be impacted by the berm widening for roadway use. Hammock/tree islands are the most likely location for cultural resources to be found. The number of cultural resources known to be within a mile of the site suggests the region was at one time actively used by native Americans. While we agree with the archaeological consultant's general recommendation that tree islands should be avoided, we were unable to find concrete

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statements that anyone has actually examined those tree islands to determine their cultural resource potential.

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Disposal Of Cuttings

The drilling operation would generate a maximum of approximately 2,000 cubic yards of drill solids or cuttings. The document should identify the specific parameters to be measured for toxicity testing, how often samples will be taken, and what criteria will be applied to determine if the cuttings are to be disposed on the reservation or in a landfill. Some acceptability thresholds for heavy metals, oil and grease, chlorides and radioactivity should also be identified. In addition, if upland sites on the reservation are to be used for disposal, the location of those sites should be identified, and the suitability and design of the disposal areas should be determined. If disposal in a landfill is indicated, the location of the nearest landfill that is permitted to receive drill cuttings should be identified.

76

Diesel Fuel Spill and Ground Water

We are concerned that potential ground-water contamination from the diesel fuel tank spill (page 3-31) will be pulled south by the water wells to the drill site. The cones of depression created by water well pumping could draw hydrocarbon contamination into the exploratory well. Two water supply wells are to be drilled south and on either side of the surface hole location. These wells will be cased to approximately 60 feet, and open hole (uncased) to about 120 feet. The Draft EIS notes the existence of a diesel fuel spill from two 15,000-gallon aboveground storage tanks situated at SFWMD S-140 pump station which is located about 1225 feet northeast of the surface hole location. While the contaminated soil has been removed, the Draft EIS indicated that the horizontal and vertical delineation of the soil and groundwater contamination has not been determined. If the exploratory well is not cased during the initial drilling, the exploratory well might act as a conduit for contaminant migration into these water wells. Because of the uncertainty of diesel fuel migration into the aquifer, the applicant should add to the laboratory analyses the total petroleum hydrocarbon parameters in the downgradient and upgradient monitoring wells.

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Disposal of Drilling Liquids

The applicant plans to dispose of excess drilling fluid and stormwater into the "boulder zone" at a depth of about 2900 feet (Page 4-34, Fluids Disposal). EPA is aware that it is common industry practice to inject drilling waste fluids into exploration and production wells after completion of drilling operations on these wells. Although EPA does not issue Underground Injection Control (UIC) permits for these wells, it has been the position of EPA Region 4 to allow the option of reinjecting wastes provided that underground injection does not endanger any underground source of drinking water. EPA therefore requests that the applicant's underground waste injection plans

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be submitted to this Agency to ensure that this activity will not endanger any underground source of drinking water.

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Our Ground-water Protection Control Section would like to monitor disposal activities after the Final EIS is prepared and the project commences. During disposal activities, we request that the applicant provides an activity summary of the disposal operations together with supporting documentation which should include well logs for the shallow portion of the hole, geologic formation tops for the well, if available, well log calculations of the shallow hole to the lowermost source of drinking water, chart recorder of pressure tests documenting cement shoe casing protection of the lowermost underground source of drinking water, pump pressure logs of disposal activities to document that test pressures do not exceed the 20-inch casing cement shoe, copies of daily reports for disposal activity, chart recorder of pump pressures for disposal activity, copy of the well log and completion report affidavit, and a copy of the plugging affidavit, if appropriate.

Spill Prevention Control and Countermeasure Plan

The drilling operation offers the potential for spills to the adjacent surface water system. The Spill Prevention Control, and Countermeasure (SPCC) Plan is somewhat general in nature because it does not address site specific remedial or containment activities. We would expect to see a plan specific to this site in the final EIS. Also, we would expect to see notification of all spill events extended to include SFWMD.

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We rate the environmental impact of this action as EC-2, (Environmental Concerns) because the Draft EIS does not contain sufficient information to fully assess environmental impacts of exploratory drilling. In order to fully protect the environment, certain environmental impacts must be avoided, and to determine these impacts, we require the additional information noted above. We appreciate the opportunity to review this proposed action; should any further clarification be required, we will be glad to meet with you at your request to discuss these issues. Please call me or John Hamilton at (404) 347-3776 if additional information is needed.

Sincerely,

Heinz J. Mueller

Heinz J. Mueller, Chief
Environmental Policy Section

CC: D. Henningsen, Florida Department of Office and Budget
L. Griffin, Florida Department of Environmental Planning
J. Dempsey, South Florida WMD
B. Cypress, Tribal Chairman, Miccosukee Indian Tribe

FG-7

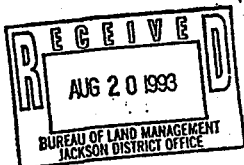
FG-8



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV
345 COURTLAND STREET, N.E.
ATLANTA, GEORGIA 30365

AUG 18 1993



Robert V. Abbey
District Manager
Bureau of Land Management
411 Briarwood Drive, Suite 404
Jackson, Mississippi 39206

RE: Draft Environmental Impact Statement (EIS), Shell Western E&P Inc., Miccosukee 3-1 Exploratory Well, Miccosukee Indian Reservation, Broward County, Florida

Dear Mr. Abbey:

As a follow-up to our June 7, 1993 comment letter on the Draft Environmental Impact Statement on proposed Miccosukee 3-1 Exploratory Well, we are providing you with additional information as to EPA's authority under Section 1424(e) of the Safe Drinking Water Act.

This Agency's Sole Source Aquifer Program is authorized by Section 1424(e) of the Safe Drinking Water Act. The Act provides EPA with the authority to designate aquifers as "sole source aquifers". Once so designated, the Agency is then authorized to review projects that receive Federal financial assistance to determine if the project would contaminate the aquifer so as to create a significant hazard to public health. Pursuant to the Act, no commitment of Federal financial assistance may be entered into for any project that would contaminate a sole source aquifer that would create a significant hazard to public health.

Based on the available information, the subject proposal does not involve Federal financial assistance and would, therefore, not be subject to the provisions of the Sole Source Aquifer Program. Hence, the Agency would not pursue this project through the authority of 1424(e) of the Safe Drinking Water Act.

Please contact me or John Hamilton at 404/347-3776 if you would like to discuss our comments.

Sincerely,

Heinz J. Mueller

Heinz J. Mueller, Chief
Environmental Policy Section
Federal Activities Branch



United States Department of the Interior

GEOLOGICAL SURVEY
WATER RESOURCES DIVISION
9100 N.W. 36th STREET
MIAMI, FLORIDA 33178

May 19, 1993

Mr. Robert V. Abbey
District Manager
Bureau of Land Management
411 Briarwood Drive, Suite 404
Jackson, Mississippi 39206

Dear Mr. Abbey:

I have reviewed and made comments concerning the final DEIS for the Shell Western E&P, Inc., Miccosukee 3-1 Exploratory Well prior to release to the public for the hearing. I have no post hearing comments to this document at this time. However, I do have a suggestion for future public hearings.

While the Executive Summary is very informative, confusion by the public as to the hydrology of the Biscayne aquifer was prevalent. I suggest including to the summary, a list of appendices presented in the final DEIS. Also, I suggest including lists of references for each applicable appendix. This would enable concerned citizens to access particular documents or information prior to the hearing. One specific appendix (A-6 "Hydrology Report") could have clarified the above confusion.

If you have any questions, comments, or if I can be of any further assistance, please call me at (305) 526-2895.

Sincerely,

Edward J. Kozalka

Edward J. Kozalka, Chief
Investigative Studies Section

EJK:dr



FG-9

FG-10

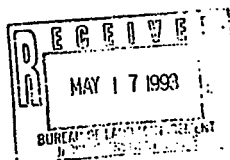


United States Department of the Interior

NATIONAL PARK SERVICE
Southeast Regional Office
75 Spring Street, S.W.
Atlanta, Georgia 30303

N16(SER-ODN)

MAY 14 1993



Mr. Robert V. Abbey
District Manager
Bureau of Land Management
411 Briarwood Drive, Suite 404
Jackson, Mississippi 39206

Dear Mr. Abbey:

We have reviewed the Draft Environmental Impact Statement (DEIS) on the Shell Western Exploration and Production, Incorporated, Miccosukee 3-1 Exploratory Well (DEC-93/0007) prepared by the Bureau of Land Management (BLM) and Bureau of Indian Affairs (BIA), and submit the following comments.

General Comments

The Miccosukee No. 3-1 exploratory oil and gas well proposed by Shell Western Exploration and Production, Inc. (SWEPI) is to be located approximately four miles east of Big Cypress National Preserve (BICY) and 25 miles north of Everglades National Park (EVER). The proposed well location is on the Miccosukee Indian Reservation which borders the northeast boundary of BICY.

SWEPI proposes to use directional drilling techniques to drill the Miccosukee No. 3-1 well. The surface location for the subject well is adjacent to Florida Water Conservation Area 3A (WCA 3A) in an area developed by Interstate 75, pasturelands, canals and levees. However, the bottomhole target lies beneath WCA 3A. EVER is immediately south of WCA 3A.

Public concern for protecting the integrity of the Everglades ecosystem watershed has driven this environmental analysis process and the scope of the proposed action for the Miccosukee No. 3-1 well. According to the DEIS the BLM and BIA have prepared a more detailed environmental impact statement in place of an environmental assessment to "demonstrate the agency's recognition of the public concerns and to assure that the potential environmental impacts of the proposal would be thoroughly addressed."

The DEIS appears deficient because it does not address the environmental impacts to the Everglades ecosystem from operations

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that would follow a hydrocarbon discovery. The DEIS limits the proposed action and environmental impact analysis to only exploratory drilling and testing operations. The DEIS downplays the chances of discovering hydrocarbon reserves by compiling "dry hole" statistics for southern Florida and deliberately avoids assessing environmental impacts of production from this exploration well, further exploratory drilling, and oil and gas field development.

The DEIS states the chance of discovering oil or gas, based on historical drilling in the area, is seven percent (one in 14 wells drilled become producers). We concur that "wildcat" exploratory drilling is highly speculative. However, technical information available only to SWEPI for this specific prospect may increase the chances of discovering a viable hydrocarbon reserve.

15

It is certainly logical to assume that SWEPI will request permission to produce the subject exploratory well and pursue further drilling and production in the area following discovery of a hydrocarbon reserve. Therefore, the DEIS should evaluate the environmental impacts associated with a successful discovery well. We suggest that the DEIS assess such impacts based on a reasonably foreseeable development scenario defined by the average oil and gas field size existing on the Sunniland Trend in south Florida.

Field development would entail more access roads, drilling operations, pipelines, processing equipment, traffic, etc. Such development, depending on location, may pose a pronounced threat to resources and values of EVER and BICY. Potential impact issues include protection of hydrology, water quality, endangered species populations (e.g., Florida panther), vegetation, wildlife, air quality, and noise.

Technical Comments

The DEIS shows that SWEPI proposes to use some of the most environmentally sound technologies available to drill the subject exploratory well. These technologies include closed mud systems, partially lined pads, and on-site disposal of non-hazardous waste fluids via annular injection into the "boulder zone." Directional drilling of the Miccosukee No. 3-1 exploratory well from the proposed surface location including prescribed environmental protection techniques will likely mitigate direct and indirect impacts to EVER, BICY and WCA 3A. The proposed action in the DEIS addresses most issues typically raised concerning exploratory drilling operations. However, the following few concerns remain:

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1. The proposed action addresses the drilling of water wells on the oil well drilling pad. However, the DEIS does not discuss plugging and abandonment methods for the water wells. Section 2.2.1.5, Abandonment and Reclamation, should describe proposed

methods to accomplish water well plugging and abandonment.

2. Figure 2-5 defines areas on the drilling pad that will be lined and bermed to prevent surface and subsurface contamination. This includes the area for the drill rig and temporary storage for drill cuttings. We suggest expanding the lined and bermed area on the pad for well testing, fracing, or acidizing operations because more equipment having leak potential will be on the location. Additional lined and bermed area on the drilling pad will afford more secure space for well testing or treating equipment and associated storage tanks.

In summary, drilling and testing of the proposed Miccosukee Well 3-1 well as proposed in the DEIS will not likely affect the environments of either BICY or EVER. Conversely, major drilling and field development programs that could follow a hydrocarbon discovery in the area may cause adverse environmental impacts to BICY and EVER. The DEIS remains deficient in describing potential oil field development and assessing associated environmental impacts to the Everglades ecosystem.

Please contact Bruce Rodgers at 404 331-4916 if you have any questions about these comments.

Sincerely,

James W. Coleman, Jr.
James W. Coleman, Jr.
Regional Director
Southeast Region

EARTH DAY '91 RESOLUTION Opposing Oil Drilling in the Everglades

- WHEREAS the Everglades are considered to be Florida's greatest natural resource and provide habitat for many endangered species of flora and fauna;
- WHEREAS the Everglades wetlands recharge the Aquifer which is the sole source of South Florida's potable water supply;
- WHEREAS Shell Oil is requesting a permit to drill for oil in the Everglades which may destroy this valuable resource;

THEREFORE, we the undersigned oppose Shell Oil's permit request to drill in the Everglades.

Name	Address	Phone
1. <i>James W. Coleman, Jr.</i>	404 331-4916	404 331-4916
2. <i>James W. Coleman, Jr.</i>	404 331-4916	404 331-4916
3. <i>James W. Coleman, Jr.</i>	404 331-4916	404 331-4916
4. <i>James W. Coleman, Jr.</i>	404 331-4916	404 331-4916
5. <i>James W. Coleman, Jr.</i>	404 331-4916	404 331-4916
6. <i>James W. Coleman, Jr.</i>	404 331-4916	404 331-4916
7. <i>James W. Coleman, Jr.</i>	404 331-4916	404 331-4916
8. <i>James W. Coleman, Jr.</i>	404 331-4916	404 331-4916
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12. <i>James W. Coleman, Jr.</i>	404 331-4916	404 331-4916
13. <i>James W. Coleman, Jr.</i>	404 331-4916	404 331-4916
14. <i>James W. Coleman, Jr.</i>	404 331-4916	404 331-4916
15. <i>James W. Coleman, Jr.</i>	404 331-4916	404 331-4916
16. <i>James W. Coleman, Jr.</i>	404 331-4916	404 331-4916
17. <i>James W. Coleman, Jr.</i>	404 331-4916	404 331-4916
18. <i>James W. Coleman, Jr.</i>	404 331-4916	404 331-4916
19. <i>James W. Coleman, Jr.</i>	404 331-4916	404 331-4916
20. <i>James W. Coleman, Jr.</i>	404 331-4916	404 331-4916
21. <i>James W. Coleman, Jr.</i>	404 331-4916	404 331-4916
22. <i>James W. Coleman, Jr.</i>	404 331-4916	404 331-4916
23. <i>James W. Coleman, Jr.</i>	404 331-4916	404 331-4916
24. <i>James W. Coleman, Jr.</i>	404 331-4916	404 331-4916
25. <i>James W. Coleman, Jr.</i>	404 331-4916	404 331-4916
26. <i>James W. Coleman, Jr.</i>	404 331-4916	404 331-4916

Broward County Audubon • Broward Sierra Club • Environmental Coalition of Broward County
Mail completed petitions to 412 NE 3rd Ave., Ft. Lauderdale, FL 33301



WHAT'S GOING ON
HERE?

April 19, 1993

Mr. Robert Abbey
Jackson District Office
U. S. Bureau of Land Management
411 Briarwood Drive
Suite 404
Jackson, MS 39206

Dear Mr. Abbey:

It is Land Management's responsibility to protect those areas which are critical to the environment which impacts mankind. You, as our charge over these important issues, are to be made responsible and accountable for the decisions that we ourselves would have made. I'm relying on you to make the most mindful and heartfelt decision that's needed in regard to Shell Oil Company drilling in Florida Everglades. It's a fact that the fresh water in Florida (especially in the southern region) is in big trouble. The Florida Bay is dying as is the wild life there, the warnings given fishermen about eating any fish is saddening, whales/porpoise/turtles/manatees are beaching themselves because they are dying with diseases related to pollution of Florida waters. We have already cut canals and redirected waterways in our quest to better the system. It's evident to all of us that we have not accomplished those goals. LET'S STOP - RETHINK OUR END RESULTS FIVE (5), TEN (10) OR TWENTY (20) YEARS DOWN THE ROAD. If we fail to do this, there will be NO road or anyone to enjoy this magnificent planet.

PLEASE CONSIDER THIS REQUEST OF A CITIZEN WHO'S
VERY CONCERNED ABOUT THIS EARTH!

Charles J. Sincerely, Linda Coxon et al.
Barbara Murrell Hopewell
Dee Bushadama
Lana Hardner
Carol Barker
Frank no Pretzel
Jonnie Bauer
Joseph Gaudin
Suzanne Mich
Roni Evans
Jeff Frank

TELL SHELL OIL TO STAY OUT OF THE EVERGLADES!

The Shell Oil Company intends to drill for oil on Miccosukee land just outside the Big Cypress National Preserve, under the water conservation area #3. The Everglades is a "Wetland of International Importance", a "World Heritage Park" and a "World Biosphere Preserve" labeled by the United Nations. The ecosystem supports more diversity of life than any other single bioregion in the North American continent; yet, the Everglades is among the most sensitive and endangered ecosystems in the world. The area for the proposed drilling site is prime habitat for one of the most endangered species in the world, the Florida Panther.

Join Earth First! in a nationwide boycott of Shell service stations and sign the petition below if you want Shell Oil to know of your opposition to this outrageous and arrogant plan to profit at the expense of the Everglades.

NAME	COMMENTS
ERIC HUEB	MY SHELL OIL CARD IS NOW IN 28 PRICES
AMY HARRIS HARRIS	MANY OF MY FRIENDS HAVE SIGNED CARDS. THEY WANT TO ME. I'M TELLING THEM TO STOP!
James Gubie	I WILL NEVER BUY YOUR GAS OR OIL AGAIN! I TELL FRI
Carol Meads	EXXON, SHELL... I'D RATHER WALK!
LES GREENHILL	Why won't you dudes check out the alternatives
Mary Collins	
Catherine Deas	How do you plan to drill through our habitat
Laurie Shiber	KEEP OUT!
Tom Selis	Leave the Everglades ALONE!
Lee Emerson	The people will have a sustainable world - oil goes first
Sidney Middelich	Earth First! Shell / ASE!
Samuel	I'm really used to Shell oil - now I'm really
Jeff Dandridge	IT'S TIME FOR SOME ALTERNATE FUELS
Jeff Dandridge	I will GET ANOTHER CAR!
Chris Shuck	I will stop buying your gas!
Michael Winkler	
Laura Munkit	
Eric R.	
Ann S. Birch	I've already stopped buying your gas
Moss Gabelman	401 NE 56th St. Ft. Lauderdale FL 33331
Patricia Y.	5981 NW 80th Ave. Parkland FL 33067
Gusman Dell	3823 NW 59th St. Coconut Creek FL 33073
William Landrey	2298 SE 13 St. Pompano 33067
William Landrey	2298 SE 13 St. Pompano 33067
Shirley Williams	6230 NW 17th. Sunrise FL.

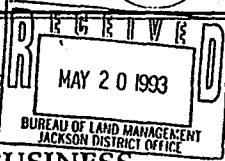
BOYCOTT SHELL

RECEIVED
APR 14 1993

P-4

**FRIENDS OF THE
EVERGLADES**
Founded by Marjory Stoneman Douglas

Petition to Protect the Everglades from Oil Exploitation



DON'T LET SHELL DO THEIR BUSINESS IN OUR WATER

We the undersigned insist that our government reject any proposal to exploit the Florida Everglades for commercial development. We believe that the water resources of South Florida are now so highly stressed that any further exploitation by Shell Oil Company and others would irreversibly damage this precious life-support system. Without the waters of the Everglades, South Florida, as we know it, would cease to exist. For our state and our children we urge President Clinton to intervene now in this crisis, calling on all the resources at his disposal, to finally solve the problems that have plagued us for fifty years, and to stop Shell from doing its business in our water.

Name:

Address:

Phone:

Lorrie Carpenter 1325 Spokane Ave Orlando 32803
 Ruth Eversole 450A CENTRAL AVE HAITLAND 32751
 Barb Roberts 417 Mallard Cir WP FL 32780
 Nancy L Campbell 5524 N. Range Bunkinville FL 32465
 Samantha Brown PO Box 2172 Crystal River FL 32642
 Clarice Castillo 4850 Ocean Bch Blvd, 205, Camellia
 Jean Twined 444 Naish Ave Cocoa Beach FL 32931
 Anne Underhill 123 Tane Dr Cocoa Beach FL 32931
 Elaine Noel 1313 Canterbury Rd Winter Park, FL 32789

Please return filled petitions to: Friends of the Everglades,
101 Westward Drive, #2, Miami Springs FL 33166; Phone 305-888-1230

P-5

GREENPEACE

WE, the undersigned, call upon The Bureau of Land Management and The Bureau of Indian Affairs, to halt the proposed drilling by SHELL OIL COMPANY, INC. in the FLORIDA EVERGLADES. In spite of the Environmental Impact Study (EIC), paid for by SHELL, which states that the proposed drilling would be "safe", the EVERGLADES are an already over stressed ecosystem and cannot withstand the additional consequences of disruption and contamination from drilling. WE demand that you deny SHELL OIL CO, INC. permission to further destroy the EVERGLADES.

PLEASE PRINT

NAME	STREET	CITY/STATE/ZIP
1. Mike Housh	176 th NWB	FL 33162
2. George Sibila	1499 N.E. 176 th NWB	FL 33162
3. Helen Sibila	1498 N.E. 176 th NWB	FL 33162
4. Rachel Parenzuela	1432 NE 176 th ST NWB	FL 33162
5. Teresa Barrera		
6. Miquelina Rodriguez		
7. Dan Caraway	1395 NE 177 th ST NWB	FL 33162
8. Bob	139 th NE 176 th ST NWB	33162
9. G. Dancy		
10. R. Conway	1374 NE 176 th ST NWB	FL 33162
11. H. Brown	1358 NE 176 th ST NWB	FL 33162
12. RICARDO RICARDO	1348 N.E. 176 th ST NWB	33162
13. Daniel Riquie	1387 NE 176 th ST NWB	33162
14. Fred McLean	1395 NE 176 th ST NWB	33162
15. Susan Kersel	1401 NE 176 th ST NWB	33162
16. Anita L. Boaset	1748 NE 176 th ST NWB	FL 33162
17. G. Lina, S.	1880 NE 176 th ST NWB	FL 33162
18. Paul G. K. K. K.	1880 NE 176 th ST NWB	FL 33162
19. G. Lina, S.	1880 NE 176 th ST NWB	FL 33162
20. Mary Penven	505A NW BAY Dania	FL 33004

GREENPEACE 4141 N ANDREWS AVE. SUITE 203, FT LAUDERDALE FL 33309
PHONE (305) 563-3321

P-6

GREENPEACE

SAVE THE EVERGLADES
STOP SHELL OIL!

TO: Mr. Sid Vogelpohl
Bureau of Land Management
FR: Concerned citizens of Florida

Mr. Vogelpohl -

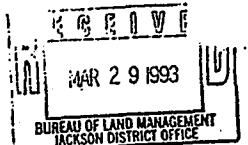
We demand that you deny Shell Oil Company permission to exploit our one and only Everglades. This unique ecosystem is already threatened by mercury, dioxin, and pesticides. We dare not add oil exploration to that list.

Further, we are outraged that such a potentially damaging project could be undertaken without an Environmental Impact Statement. We implore you to immediately call for a full EIS.

There is only one Everglades, but there are many ways to meet our nation's future energy needs. Energy efficiency and clean, renewable sources of energy must form the cornerstone of the United States energy strategy. Please stop the needless destruction of Florida's River of Grass.

NAME	ADDRESS	PHONE
1. Alex R. B. B.	9510 SW 54th Miami FL 33156	(305) 224-2222
2. Bob B. B.	7204 N.E. 10th Ave	33138
3. Paul B. B.	5161 NW 116th Blvd	33145
4. John B. B.	5601 NW 116th Blvd	33145
5. John B. B.	11102 NW 25th St	33145
6. John B. B.	11102 NW 25th St	33145
7. John B. B.	11102 NW 25th St	33145
8. John B. B.	11102 NW 25th St	33145
9. John B. B.	11102 NW 25th St	33145
10. John B. B.	11102 NW 25th St	33145
11. John B. B.	11102 NW 25th St	33145
12. John B. B.	11102 NW 25th St	33145
13. John B. B.	11102 NW 25th St	33145
14. John B. B.	11102 NW 25th St	33145

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March 24, 1993

Robert V. Abby
United States of the Interior
Bureau of Land Management
411 Briarwood Drive, Suite 404
Jackson, Mississippi 39206

Dear Sir,

Subject: Draft Environmental Impact Statement Shell Western
E & P Ins.

Exploratory Well - Miccosukee Indian Reservation, Broward
County, Florida

The Scope of Analysis is very well written but there were
two concerns maybe should be considered.

The No Action is warranted for the reasons listed.

Where and If Temporary abandonment is warranted there should
be a definite length of time set for the Shell Oil Co.
to abandon the area. Temporary abandonment might not be
strong enough words. When the embargo on oil was put on
South Africa - every oil Co. but Shell Oil Co. pulled out
but Shell Oil Co. - they stayed and fueled the military
who were sending their tanks to kill the youth of that
Country. It seems that where human rights are concerned
Shell Oil Co is not very concerned. Another thought is
that we Floridians love our sunsets without oil rigs to
appear on the horizon.

Sincerely,

and
 Mrs. and Mr.
 Jackie Rickett Richard Lindstrom
 9880 Sheridan St. #101
 Pembroke Pines, FL 33024
 and
 P.O. Box - Neighbors

P-8

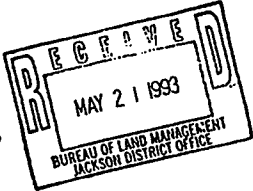
P-9

Richard A. Johnson, M.D., P.A., F.A.C.S.



Broward General Medical Building
1625 S.E. 3rd Ave., Suite 721
Fort Lauderdale, Florida 33316
Telephone (305) 523-7920
Fax (305) 523-6723

Jackson District Office
Bureau of Land Management
411 Briarwood Drive
Suite 404
Jackson, Mississippi 39206



To Whom It May Concern:

As concerned residents of Broward County, we are writing to show our rejection of Shell Oil Company's application for oil drilling in the Everglades. The Everglades are a precious natural resource and we feel that any type of oil drilling is irresponsible and preposterous! Not only is our water supplied by the aquifer which could be contaminated but any oil spill accident will have devastating effect of the wildlife that inhabit the Everglades.

Please do not allow this to happen by denying Shell's utilization of Florida's Everglades for oil exploration. Many of us are Shell credit card holders and are willing to boycott in protest of their actions.

Name JILL FORSBERG
Address 1728 N VICTORIA PK RD FT LAUD, FL 33305

Name Steven Ricciardi
Address 5420 S.W. 43 Terr. Ft. Lauderdale, FL 33314

Name CHRISTINA LAMPSON
Address 5025 NW 36th Lane, FL 33319

Name Raymond Malinowski
Address 5025 NW 36th Lane, FL 33319

Name Virginia Hoodwax
Address 6025 NW 47th St, Fort Lauderdale, FL 33319

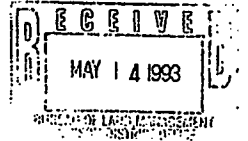
Name James Ferguson
Address 1310 N.W. 32 Ave, Ft. Lauderdale, FL 33311

Name William J. Smith
Address 4101 NW 5th Ave, Ft. Lauderdale, FL 33304

Name Sharon R. Caples
Address 8931 NW 80th Dr, Tamarac, FL 33321

Name Mark L. Lugo
Address 1728 N VICTORIA PK RD FT LAUD, FL 33305

April 20, 1993



Jackson District Office
Bureau of Land Management
411 Briarwood Drive, suite 404
Jackson, Miss 39206

Gentlemen:

Please do not approve drilling for oil in the Everglades. We are running out of pristine habitats--we need them to survive in this world. You should know that. Man exists only with the ocean, plants and animals in balance.

Keep the airports out of there also. Florida is unique. Keep it that way. Besides, if the oil companies had any guts, they should all be cooperating to change over gasoline and other oil products to environmentally safe products. Greed, greed, greed!!! Technology exists but no one in a position of responsibility will grab the lead to negate the need for oil drilling.

I have a Shell credit card of which I am proud and have used many, many years. I will cut it up and send it back to the company if they drill in unique, environmentally areas in Florida. I love Florida. I can drive a car with a different type of propellant if they will just make it available.

Remember that unique expanse known as Alaska, with its pristine wilderness. And the culprit in that was a passing tanker. And you know how tragic that Exxon Valdees spill was and still is. I did not accept an offer recently from Exxon for a credit card.

Sincerely yours,

Helen M. Roeder

Helen M. Roeder
830 NE 14 Place
Fort Lauderdale, FL 33304

Clarence Saunders
Denise Saunders

1568 NE 39 St
Oakland Park, FL 33334

James R. Dennihan
517 N.E. 27th Ave
Fort Lauderdale, FL 33304

James R. Dennihan
3888 SW 19th Pl #B
Fort Lauderdale, FL 33312

P-10

SENT BY: Kinko's Hollywood, FL : 5-18-93 : 9:05PM : KINKO'S-HOLLYWOOD, FL-

601 9775440: # 2

810 N. 70 Avenue
Hollywood, FL 33024
May 17, 1993

Jackson District Office
Bureau of Lands Management
411 Briarwood Drive, Suite 404
Jackson, MS 39206

Attention Robert Abbey

Dear Mr. Abbey:

The proposed oil drilling in the Everglades is an outrageous defiance of logic and reason.

The evidence against the proposal is so overwhelming as to be obvious even to a child. To jeopardize our precious water supply would be suicidal. The habitat destruction that will occur is intolerable. And your statement that there may be some weakness in the plan is specious--there shouldn't even be a plan to explore for oil in the River of Grass. The Everglades is already endangered. When an environmental impact statement prepared for Shell concludes the the exploratory well would "have only minor environmental impact," I am reminded of the times when I have been in a medical office and have been advised "This may hurt a little." After the first time I learned how to interpret that, and I do not believe the environmental impact statement either. Anyone with any sense knows differently, no matter how many paid officials swear to a fiction.

How can you do this to us and our Everglades?

Sincerely,

Charlotte R. Seely
Charlotte R. Seely

The persons whose names, addresses, and signatures follow join me in this protest:

Myrna Farbach, 6737 Rose Drive
Miramar, FL 33023

Ruth Hill, 2033 Jefferson Street
Hollywood, FL 33021

Stephen Ploano, 10251 Cypress Court
Pembroke Pines, FL 33026

Betty Husney, 3030 N. Ocean Blvd.
Apt. 3, Ft. Lauderdale, FL 33308

Lorraine Cook, 21121 S.W. 85 Ave.,
No. 205, Miami, FL 33189

Linda Hoag, 321 S.W. 83 Ave.
Ft. Lauderdale, FL 33068

Nancy Hubbs, 3410 Foxcroft Road
Miramar, FL 33025

Lila Huppert, 421 S.W. 105 Ave.
Davie, FL 33328

Elsie Kolassa, 2084 S.W. 45 Manor
Ft. Lauderdale, FL 33315