



November 17, 2025

The Honorable Doug Burgum
Secretary of the Interior
1849 C Street NW
Washington, DC 20240

Dear Secretary Burgum,

The undersigned organizations write to you to express concern over the Department of the Interior's (DOI) plan to revoke the 20-year administrative minerals leasing withdrawal of federal lands within the 10-mile protection zone around Chaco Culture National Historical Park (CCNHP). The region contains thousands of archaeological and cultural sites of enduring significance to descendant Pueblos and Tribes. Public Lands Order (PLO) No. 7923, which withdraws these lands from leasing, was promulgated in 2023 to ensure protection of these places from future oil and gas development. I urge you to (1) reconsider the planned revocation of PLO No. 7923 and (2) follow the legal administrative procedure for consultation with associated Pueblos and Tribes and solicitation of public comment on the planned action.

The SAA is an international organization founded in 1934 that is dedicated to research about and interpretation and protection of the archaeological heritage of the Americas. With more than 6,000 members, the SAA represents professional and avocational archaeologists, archaeology students in colleges and universities, and archaeologists working at tribal agencies, museums, government agencies, and the private sector. The SAA has members throughout the United States, as well as in many places around the world.

Formed in 1967, the Society for Historical Archaeology is the largest scholarly group concerned with the archaeology of the modern world (A.D. 1400-present). The main focus of the Society is the era since the beginning of European exploration. SHA promotes scholarly research and the dissemination of knowledge concerning historical archaeology. The SHA is specifically concerned with the identification, excavation, interpretation, and conservation of sites and materials on land and underwater.

Centuries ago, Chaco Canyon was the heart of a thriving culture that flourished throughout what is now northwest New Mexico and portions of adjoining states. Between AD 850 and 1150, Chacoans constructed massive masonry great houses and small pueblos, invested in agricultural infrastructure, and built shrines in Chaco Canyon. They built hundreds of miles of roads leading out of the canyon to settlements, shrines, and natural features in the surrounding area. These roads and the sacred places they connect with comprise the Greater Chaco Landscape that PLO No. 7923 protects. For descendant communities, Chaco is not full of abandoned sites—it is a living cultural landscape and is frequently visited by Pueblo people to reconnect with their ancestors and history. In recognition of its cultural and scientific value, CCNHP was designated a UNESCO World Heritage site.

On October 30, the Bureau of Land Management (BLM) Farmington Field Office formally notified the 24 associated Pueblos and Tribes that consultation regarding the revocation of the mineral withdrawal would soon begin. Letters sent from the BLM indicate an expedited timeline under the National Environmental

Policy Act (NEPA) with an extremely short 14-day public comment period. In contrast, the process to withdraw lands from mineral exploration and production initiated in 2021 by then-Secretary Deborah Haaland lasted nearly two years and involved in-person consultation with tribal governments and an extended public comment period of over 120 days. This process revealed that the withdrawal of minerals leasing from federal lands surrounding Chaco enjoys broad support from tribal members and the general public.

Revocation of the mineral withdrawal will be harmful for the protection of CCNHP, the Greater Chaco Landscape, and the cultural sites that lie within the 10-mile zone. Reconnaissance survey in 2020 identified over 4,200 archaeological, cultural, sacred, and historic sites in the more than 300,000-acre withdrawal area. Reopening these lands to minerals leasing will threaten these sites and potentially cause irreparable harm to the Tribes and Pueblos that hold these places sacred.

We strongly encourage you to uphold your legal trust obligations with Tribes to engage in meaningful consultation and extensive community outreach. In contrast to an arbitrary, expedited review process, you are required to provide a *minimum* of 30 days for Pueblos and Tribes to consult and make their concerns known. For the larger public engagement and comment period, 14 days is completely inadequate and nothing less than 90 days, with meetings in Albuquerque and Farmington, is acceptable.

Finally, we urge you to reconsider the revocation process entirely. The unique heritage values of the Greater Chaco Landscape require the protections created by PLO No. 7923.

Sincerely,

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