



SOCIETY FOR AMERICAN ARCHAEOLOGY

January 26, 2015

Bureau of Land Management
c/o Scott Hall
6251 College Blvd. Suite A
Farmington, NM 87402
VIA: BLM_NM_Comments@blm.gov

Dear Mr. Hall:

We are writing in response to the Bureau of Land Management's call for scoping comments for the Saddle Butte Pinyon Pipeline, an 80 mile long crude oil transport pipeline proposed in the San Juan Basin of northwestern New Mexico. We appreciate the opportunity to provide input on this important matter.

The Society for American Archeology (SAA) is an international organization that, since its founding in 1934, has been dedicated to the research about and interpretation and protection of the archaeological heritage of the Americas. With more than 7,000 members, SAA represents professional archaeologists in colleges and universities, museums, government agencies, and the private sector. SAA has members in all 50 states as well as many other nations around the world.

The Saddle Butte Pinyon Pipeline has already attracted a great deal of public controversy. If the Bureau of Land Management evaluates this proposal as a "stand alone" project, we urge you to use the Environmental Impact Statement process, rather than the more constrained Environmental Analysis process. SAA is concerned about several specific aspects of the Saddle Butte Pinyon Pipeline proposal:

- 1.) The proposed pipeline and its alternative pass through several important Chacoan landscapes. Because these landscapes are incompletely known, resources outside the pipeline corridor will also need to be identified. This will provide the context needed to determine how resources in the area of potential effect are connected to the larger landscape and how they should be treated. Natural landscape features should also be considered, and identification of some cultural features such as prehistoric "roads" will require supplemental studies guided by analysis of historical aerial photography and modern remote sensing technologies.
- 2.) In addition to archaeological sites that may be directly impacted by the construction, other archeological sites along the pipeline route may become accessible to visitation, collection or vandalism. These vulnerabilities should be considered carefully.

3.) Other archeological sites located near the route will become vulnerable to indirect effects related to pipeline maintenance and operation, such as crude oil leaks and spills. The proposal should be explicit about construction, maintenance, and operating procedures intended to minimize these situations, and protocols to be used when they do occur.

4.) The pipeline route passes through areas of traditional Native American use, where traditional cultural properties such as shrines, collection area, offering sites, trails and other significant properties are likely to be present. The 1992 amendments to the National Historic Preservation Act clearly identify traditional cultural properties as a class of historic properties eligible for nomination to the National Register of Historic Places.

In more general terms, the SAA perceives the proposed Saddle Butte Pinyon Pipeline as an integral component of a much larger program of energy development in the San Juan Basin. Because of this linkage, the pipeline project will contribute to an array of local and regional changes that will have socio-cultural as well as environmental and cultural resource effects. Given the irreversible nature of these changes, evaluation of the Saddle Butte Pinyon Pipeline project seems premature. We suggest that the pipeline be evaluated as part of the larger development program and not be allowed to move forward as a separate undertaking.

Sincerely,

A handwritten signature in blue ink that reads "Jeffrey H. Altschul". The signature is fluid and cursive, with a large, sweeping flourish at the end.

Jeffrey H. Altschul, Ph.D., RPA
President