

**CALIFORNIA TURTLE & TORTOISE CLUB**  
**P.O. BOX 7300**  
**VAN NUYS, CA 91409-7300**



February 20, 2007

[www.tortoise.org](http://www.tortoise.org)

Superintendent, Padre Island National Seashore  
P.O. Box 181300  
Corpus Christi, TX 78480-1300

Re: Proposal by BNP Petroleum Corporation to Drill Three Gas Production Wells within Padre Island National Seashore, Kleberg County, Texas

Dear Superintendent:

On behalf of the officers and 2,000 members of the California Turtle and Tortoise Club, I am providing the following comments on the scoping for BNP Petroleum's proposal to drill gas production wells within the Padre Island National Seashore.

Padre Island National Seashore is the major nesting area in the United States for the endangered Kemp's Ridley Sea Turtle. Kemp's Ridley is the smallest sea turtle species found in US waters and is the one most at risk of extirpation.

The National Environmental Policy Act requires that the lead agency review a full range of project alternatives so that an informed decision can be made. The 3 stated alternatives appear to be insufficient to meet that goal. The "no action" alternative would not allow the project to proceed and is rarely the option chosen. A second alternative would acquire the mineral rights that are part of the proposal. This is likely to be very expensive and infeasible. The third alternative is the project proponent's own proposal.

We request that a fourth alternative be considered. This fourth alternative would modify BNP's proposal to avoid any direct or indirect impacts to Kemp's Ridley whatsoever. The fourth alternative would not allow drilling to take place on Padre Island National Seashore during the Kemp's Ridley nesting season or the period of time when hatchlings might be emerging. Vehicles used in the construction and operation of the production wells would not be allowed to drive on the beach. BNP would provide full funding for the National Park Service staff required to ensure compliance.

In addition, if there are additional mineral rights still outstanding, we request that the alternative to acquire mineral rights be modified to consider the option of acquisition of all mineral rights at Padre Island National Seashore not just those that are part of the proposal. At a minimum, any outstanding mineral rights should receive due consideration in the cumulative impacts analysis.

We thank you for this opportunity to provide scoping comments. Please add California Turtle and Tortoise Club to your mailing list so that we are included in any future mailings. Direct correspondence to: Michael J. Connor, California Turtle and Tortoise Club, P.O. Box 7300, Van Nuys, CA 91409-7300 or by e-mail to <[mconnor@tortoise.org](mailto:mconnor@tortoise.org)>.

Sincerely,

A handwritten signature in black ink that reads "Michael J. Connor" with a long horizontal line extending to the right.

Michael J. Connor, Ph.D.  
Chair, CTTC Executive Board