



United States Department of the Interior

OFFICE OF THE SECRETARY
Office of Environmental Policy and Compliance
Denver Federal Center, Building 67, Room 118
Post Office Box 25007 (D-108)
Denver, Colorado 80225-0007



November 29, 2012

9043.1
ER 12/618

Scott Fitzwilliam, Forest Supervisor
White River National Forest
P.O. BOX 943
Glenwood Springs, CO, 81602

Dear Mr. Fitzwilliam:

The Department of the Interior has reviewed the **White** River National Forest Oil and Gas Leasing Draft Environmental Impact Statement (WRNF DEIS), and offers the following comments provided by the National Park Service (NPS). The U.S. Fish and Wildlife Service advises that their Endangered Species Act concerns will be addressed through the Section 7 consultation process.

The NPS concurs that the incremental impacts (i.e., direct effects) to air quality and Air Quality Related Values (AQRVs) in nearby national parks as a result of this plan are not a significant concern. However, the regional air quality effects are a concern to the NPS. Concurrently with this Forest Service oil and gas leasing decision, the Colorado Bureau of Land Management's (BLM) **White** River Field Office (WRFO) is revising their Resource Management Plan (RMP). The WRFO RMP DEIS incorporates the **White** River National Forest Planning area, and we understand that the Forest Service's reasonably foreseeable development (RFD) scenario is consistent with the WRFO RMP RFD.

Modeling analyses for the BLM WRFO RMP predicted significant impacts to air quality and AQRVs in nearby National Park units as a result of anticipated oil and gas activity within the field office area, and indicate the need for region-wide air quality mitigation measures. To address identified air quality issues, the WRFO RMP recommends a suite of air quality mitigation measures under the various alternatives (i.e., Tier IV drill rigs, green completions, and natural gas fired compressor stations). Given the predicted air quality impacts in NPS units, we have recommended to BLM that the most stringent suite of mitigation measures proposed under any alternative is applied to the final decision. The Forest Service WRNF Oil and Gas Leasing plan should also incorporate this suite of mitigation measures to ensure that air quality is adequately address within the WRFO region. The NPS ARD would be happy to discuss potential mitigation measures with the Forest Service, and look forward to working with you on this issue. Please contact Andrea Stacy at 303-969-2816 for a full copy of NPS ARD comments on the WRFO DEIS.

The National Park Service and other bureaus of the Department of the Interior are partners in the Upper Colorado River Basin Endangered Fish Recovery Program, for four endangered fish species (Colorado pikeminnow, razorback sucker, humpback chub and bonytail) that inhabit the Colorado River system including the White River, the Yampa River and the Green River. These four endangered fish all occur in Dinosaur National Monument. Oil and Gas drilling and transportation activity in these and all tributary drainages has the potential to impact the four endangered fish species through spills of oil or drilling components. To avoid contamination of water bodies occupied by the four endangered fish species, as well as several other native fish species of management concern, we recommend that all pipelines be equipped with emergency shut-off valves, including temporary lines from each well. If shut-off valves are not possible on temporary lines, then a small catchment, or check dam, or other suitable containment methods might be constructed to prevent contamination of water bodies, regardless of how far the site is from permanent water.

If you have any questions regarding these comments, please contact John Reber, in the National Park Service, Intermountain Regional Office at telephone 303 969-2418.

Sincerely,

A handwritten signature in black ink, appearing to read "Robert F. Stewart". The signature is fluid and cursive, with a long horizontal stroke extending from the end.

Robert F. Stewart
Regional Environmental Officer

cc: David Francomb, Deputy District Ranger