

Comments on the Pre-decisional draft Environmental Assessment (EA) for
the Petrox Northern Extension Pipeline and Associated Fruitland Coal Gas Horizontal Drilling Project

From Kathleen M. Delzell, 29450 W US Hwy 160, Bayfield Colorado

1) Pg. 8 = p 12 of 78 *"The pipelines would be buried a minimum depth of 5 feet below ground surface...."*

5 feet minimum does not sound deep enough for a water line up here. Without snow for insulation, six feet would be safer. My thermometer recorded a low of -3F this last winter. I walk in several times each winter to check the house. In mid-March 2020 about half the ground was bare from the cattle guard on FS Rd 743 to my house. Two years ago there was no snow up here in March.

2) Pg. 26 = p 30 of 78 *"... the pipeline ROW is located along an old road bed within the CRA, thus reducing the impacts from "scarring" by co-locating disturbance on previously-cleared level ground rather than creating a new corridor crossing steep terrain in erosive soil."*

Saying the ROW route is along an old road bed sounds good but for some sections, the phrase exaggerates. Reality on several miles was not a "road bed" but a two-track. The only "traffic" from about 1935 to 1964 was from the Muscavitch brothers going to and from "the Little Place" (now the Delzells') and their home place (now the Vance headquarters) to cut and stack hay. We needed our Jeep when my husband first drove me up to see the land. We bought in June 1964.

The "old road bed" was long gone by the time the CRA was created. Staying out of the CRA does not automatically mean "...crossing steep terrain".

3) Pg. 26 = p 30 of 78 *"The natural Gambel oak (Quercus gambelii) vegetation community has been previously converted to a large grassland meadow; thus, the visual impact from the construction of the FGU #6-1 well pad would be minimized."*

This statement is incorrect; the proposed well pad is not in a "grassland meadow. That meadow is about the same as it has been for decades. Homesteaders up here did not clear and create meadow. Trees and brush will need to be cleared for that pad.

The primary visual impact of the well pad looks like it will be the view from Chimney Rock. If you have been up there on a tour you can clearly see FS 743 as well as the road my husband had built in 1996.

4) Pg. 44 = 49 of 78 *"Disturbance resulting from pipeline construction would be moderate and short term, as the ROW would be revegetated immediately following completion of construction. Disturbed areas would be seeded using a USFS approved native seed mixture and mulch would be applied to slow the evaporation process in the soil. There would be no ongoing disturbance for the pipeline after native grasses, forbs, and shrubs are successfully re-established."*

I am glad to see native seed mentioned. Shrubs also need to be in the mix, especially brushy plants that provide winter browse. The phrase "successfully re-established" is a good one, but I do not see any mention of how long Petrox would be monitoring to see that the natives are surviving.

From my experience here in the HDs it takes three years or more to see if what was sown is going to germinate and survive. You don't just throw your seed out and expect results the next year. You cannot ignore disturbed land. Especially during drought years, the weed seeds will germinate first. Someone will need to walk that pipeline throughout the growing season for many years to spray or dig to keep the weeds suppressed.

Comments on the Pre-decisional draft Environmental Assessment (EA) for
the Petrox Northern Extension Pipeline and Associated Fruitland Coal Gas Horizontal Drilling Project

From my experience, if you are going to need to spray for broadleaf weeds, you might not want to include forbs in your mix.

Also, for the EA to say seeding would come “immediately following completion on construction” means any time during the year; up here in the HDs, seeding in the Fall is best. That needs to be stated in the final document.

5a) Pg. 46 = p50 of 78 “Agricultural and residential uses in the area are not held to the same noxious weed control standards as oil and gas development.”

Standards are written on paper. For the oil and gas industry to have standards in one thing; to have them practiced is not always the same. Getting the ROW “successfully re-established” will take time and money. Who is responsible? USFS? Petrox? The Fossett Gulch Pipeline Company, LLC? Who monitors?

5b) Pg. 46 = p50 of 78 Ongoing agricultural and residential land uses would continue to be the primary causes for introduction and spread of noxious weeds throughout the area.”

This sentence strikes me as a diversion. It redirects one’s focus from the disturbances to the soil and its seed bank during construction of the pipeline and the well pad. Some agricultural and residential landowners/managers are responsible individuals and good stewards, others are not. The focus of this EA does not need to be shifted to pointing figures, to blaming landowners/managers.

6) Pg. 53 = p57 of 78 Figure 8, Hydrology Map My stock pond is not shown. The locations of the two developed springs and one undeveloped spring appear to be correct.

7) Pg. 66 = p70 of 78) “Vegetation removal and other construction activities would occur outside of the elk production period (May 15 to June 30) and critical winter months for elk and mule deer (December 1 to April 30) so that impacts to calving elk and over-winter elk and mule deer are minimized.”

The current proposed location for FGU #6-1 is within the elk production habitat as shown on Figure 10. A section of the pipeline ROW is also within the production and critical winter month habitat. If this statement is true, Petrox has just two weeks to complete both the well pad and laying the pipelines to the south. Is that possible?

Page 8 (p 12 of 78) says it “is anticipated that pipeline construction could begin in 2020.” To minimize impacts of calving for elk, and having critical over-wintering ground for elk and deer, that two-week window is gone for this year.

8) A general comment on timing for this project in 2020: This does not look like good year for construction in mountains already rated above average for possible fires. As Brad Pietruszka, Fuels Program Manager, US Forest Service, San Juan National Forest said in his May 19th email (SW Colorado Fire Season Outlook) “...Greenup appears to have peaked; expect rapid curing of live vegetation”.

Everything growing on my land is a month or more early; there has been no snow here since March 18th and only 1/10th inch of rain since then. Some vegetation is already crackling under my boots.

Kathleen M Delzell (to be accepted instead of a scanned signature)