



COLORADO

Parks and Wildlife

Department of Natural Resources

Durango Service Center
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Durango, CO 81301
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Mr. Walt Brown
San Juan National Forest
15 Burnett Court
Durango, CO 81301

May 22, 2020

RE: Northern Extension Pipeline and associated Fruitland Coal Gas Horizontal Drilling Project

Dear Walt,

The Colorado Parks and Wildlife (CPW) has reviewed the proposal for the Northern Extension Pipeline and associated Fruitland Coal Gas Horizontal Drilling Project in the Columbine Ranger District, in Archuleta County, CO. The proposed project is to construct the Northern Extension Pipeline, one new gas well pad and access road, and to re-complete 2 existing gas wells on San Juan National Forest Lands (SJNF) lands. CPW provided scoping comments and identified issues for this project on September 20, 2018 (Attachment 1).

The proposed Extension Pipeline is a 16 inch buried natural gas pipeline and a 4 inch produced water pipeline. Depending on the alternative chosen, the amount of disturbance will vary. Development of the Proposed Action would have a disturbance area of approximately 4 acres and will be inside the HD Mountains Colorado Roadless Area (CRA). The third component to this proposal is a re-completion of two existing gas wells in Lange Canyon. The activity in Lange Canyon will be limited to the existing disturbed footprint of the well pads and access roads.

CPW appreciates the implementation of seasonal timing limitations as project-specific Design Criteria that have been adopted to address concerns of wintering deer and elk (December 1 to April 30) and elk production areas (May 15 to June 30).

In our review of the Environmental Assessment, we did not find a discussion on the issues we raised in our scoping comments regarding the assessment and calculation of compensatory mitigation requirements under the 2006 Northern San Juan Basin Final Environmental Impact Statement Section 3.9.6.4.2. CPW supports compensatory mitigation efforts that persist for the duration of the impact. In this case, since the oil and gas facility is expected to have a 40-year life the habitat enhancements should have a lifespan commensurate with the duration of the impact. Additionally, we recommended that the USFS quantify the indirect impacts using the current best available science and mitigate the indirect impacts to support the 2013 San Juan National Forest Land Management Plan (LMP) Desired Condition 2.3.22. LMP Guidelines 2.3.62 and 2.3.63 support this Desired Condition to conduct anthropogenic activities in these important habitats in a manner that does not reduce habitat effectiveness and maintains habitat connectivity.

It is our understanding that the compensatory mitigation obligation for the neighboring Catamount Goose Creek Project is currently unfulfilled. This project similarly involves oil and gas development within the HD Mountains and affects the same migratory and wintering deer and elk herds. CPW is concerned that the mitigation commitments from the Northern San Juan Basin Final Environmental Impact Statement are falling behind the pace of development, and that the cumulative unmitigated impacts are mounting. CPW



is available to help identify and assist in the planning of appropriate mitigation projects and to identify appropriate methodologies for calculating indirect impacts.

If you have any questions or would like to discuss our recommendations, please contact District Wildlife Manager, Stephanie Taylor at the Durango Service Center at (970) 247-0855.

Sincerely,

Brian Magee for

Matt Thorpe
Durango Area Wildlife Manager

cc: CPW- Magee, Holst, Area File