



COLORADO

Parks and Wildlife

Department of Natural Resources

Durango Service Center
151 E 16th Street
Durango, CO 81301
P 970.247.0855 | F 970.382.6672

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

September 20, 2018

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 on San Juan National Forest Lands (SJNF), and to re-complete two existing gas wells on SJNF lands.

The proposed Extension Pipeline is a 16 inch buried natural gas pipeline and a 4 inch produced water pipeline. Depending on the alternative chosen for the extension pipeline, the amount of disturbance will vary, however the proposed action indicates that pipeline length is approximately 8.6 miles. The proposed new FGU#6-1 well pad would have a long term disturbance area of approximately 2 acres and a portion 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.

The new well pad, pipeline construction, drilling, completion and reclamation activities are planned for the fall of 2019. The proposed action states that there may be increased traffic and possible road closures in Lange Canyon, Relay Station Road and Fosset Gulch Road. The CPW is also aware of planned prescribed burning may take place in the Fall of 2019 for fuel reduction and wildlife habitat enhancement in/near the same area as the proposed project. CPW recommends scheduling these activities in a manner to reduce the cumulative impacts on the wildlife that utilize these areas.

The CPW has mapped this area and the surrounding area as winter range and winter concentration areas for both mule deer and elk. Other wildlife species found at this location at various time of the year include black bears, mountain lions, wild turkey and a variety of raptors and small mammals.

CPW recommends the Forest Service follow the commitments outlined within the Northern San Juan Basin Coal Bed Methane Project (2006). These commitments include avoiding, minimizing, and mitigating adverse impacts to wildlife resources within the San Juan Basin. The CPW recommends that Petrox Resources Inc., complete pre-construction biological surveys, comply with raptor nest guidelines, and screening of planned day rig activity for conflicts with known nests and roosts prior to commencing rig work.



In addition, any new surface disturbance associated with these well pads, access roads, and gathering pipelines should be mitigated off-site per NSJB FEIS Section 3.9.6.4.2. This section states that "every five years...the operator will conduct habitat enhancement projects". There is some uncertainty in the EIS regarding the frequency and duration of the compensatory mitigation habitat improvement/enhancement offsets. In our experience habitat enhancement projects typically result in improved forage condition for 7-10 years post treatment for big game. CPW supports compensatory mitigation efforts that persist for the duration of the impact. In this case, if an oil and gas facility is expected to have a 30-year life, then the habitat enhancements should be commensurate with duration of the impact. Please provide clarification on the mitigation requirements described in the EIS.

The EIS discusses and acknowledges there are indirect impacts to big game from oil and gas development. However, the EIS was limited by the science and understanding of how to analyze and quantify indirect impacts when ROD was signed in 2006. Since that time the scientific understanding of the impact mechanism and methodologies for assessing indirect impacts has matured. The proposed development is fragmenting a significant area of big game winter range that is heavily utilized during the winter. We recommend that the USFS quantify the indirect impacts using the current best available science, and consider mitigating the indirect impacts to support CPW big game population objectives. CPW is available to help identify and assist in the planning of appropriate mitigation habitat enhancement projects and to identify appropriate methodologies for calculating indirect impact.

If you have any questions or additional comments to provide regarding this project, please contact District Wildlife Manager, Stephanie Taylor at the Durango Service Center at (970) 247-0855.

Sincerely,

A handwritten signature in black ink, appearing to read "for Matt Thorpe". The signature is stylized and cursive.

Matt Thorpe
Area Wildlife Manager, Durango South
xc: CPW- Taylor, Dorsey, Magee, Holst, Area File