

Friday, May 22, 2020

San Juan National Forest
Columbine Ranger District
P.O. Box 439
Bayfield, CO 81122
Via Electronic Submission

Re: Draft Environmental Assessment for the Petrox Northern Extension Pipeline and Associated Fruitland Coal Gas Horizontal Drilling Project 53825 in Archuleta County, Colorado

To Whom It May Concern:

The following are comments on the Columbine Range District, San Juan National Forest, Archuleta Colorado April 2020 Northern Extension Pipeline and Associated Fruitland Coal Gas Horizontal Drilling Project Pre-Decisional Environmental Assessment (EA). I am the landowner abutting the proposed gas well as well as an owner with a large section of the pipeline traversing our property. I am the Chair Person for the San Juan Forest Resource Advisory Committee and I have participated on the Northern San Juan Basin Stakeholders group.

These comments address my significant concerns regarding the insufficiency of the EA, and they are as follows:

- 1) The lack of details and commitment provided in the EA regarding noise mitigation;
- 2) The lack of details provided regarding pipeline pressure; and
- 3) The lack of analysis for alternate siting options for Fruitland Coal Gas Horizontal Drilling Project FGU #6-1.

The failure to provide the details listed above make the EA deficient to fully determine the best environmental option for the project to take. As a landowner, I have grave concerns that the best siting and planning can be achieved based on the existing EA.

Noise - Section 3.2.4, p 33

The Proposed FGU #6-1 is sited just north-west of our home site. Noise effects from the proposed well and drill site are said to be "low and long-term." p. 33. Currently, the location of the well pad is close to natural silence and any disruption of that silence would create a nuisance. The EA states:

"Noise Reduction techniques and designs as identified in the 2006 NSJB FEIS (Section 3.14.5), such as constructing additional obstacles to noise in the direct path from the source of noise to the receiver (USDI 2006), would be utilized *as needed* to minimize impacts." (p. 33 *emphasis added*.)

No actual commitment is given or assured in the EA, instead the EA makes only a cursory mention to utilizing techniques "as needed." FGU #6-1's present location is between ½ to ¾ mile to the building site of our home and enforceable assurance as to specific sound mitigation requirement should be made. Today, what you hear and see at the ranch is essentially untouched. The natural sounds at the ranch dramatically enhances the value of

the property to humans and wildlife. The Forest Service must consider the significant noise degradation and impact the FGU #6-1 will have on the land that is essentially in pristine condition and address protection of the site by specific and enforceable means.

Northern Extension Pipeline - Section 2.2.1, p. 8

This description of the gas pipeline is totally inadequate, as it lacks the information that is necessary to determine the appropriate setbacks on the ranch for its building envelope. Pipeline pressure detail information is especially important because the pipeline runs through our property coming close to our home site. The EA fails to designate and describe the pressure of the planned pipeline. Pressure determination of the pipeline would impact blast radius if a failure of the line should occur. This blast radius would critically impact setbacks for any home site at the ranch. This pressure information is critical piece of information for our health and safety at the ranch and the EA appears deficient and lacking without this detail.

Location of FGU #6-1

The location for the FGU #6-1 is not, in my opinion as the landowner who will suffer the greatest impact, the ideal location of the well pad nor is it the well pad location that was originally discussed. In negotiation with Petrox and the Forest Service, the first location suggested was a site north of the property located between our property and the Delzell property. Again, it was my first impression that the well pad was to be sited just north of the ranch off the old wagon road.

If the EA evaluated the well pad site north of the property, up the wagon road toward the Delzell property, the EA could examine noise impacts in this location which is closer to the highway, further from the property's home site and therefore mitigating the noise disturbance. Furthermore, the FGU#6-1 as proposed in the EA requires a steep road on our private land to climb up-to the proposed well pad site. Building such as steep road will impact more vegetation and wildlife habitat. The additional impact on our property, which is under a conservation easement for wildlife values, is not considered in the EA. Additionally, the vegetation north of the ranch is much less dense as the vegetation to the north-west where the EA proposes to place the well pad. I state with great emphasis, the EA cannot be adequate without considering the well pad site just north of the Munger ranch.

Thank you for considering my comments.

Truly,


Caroline Munger

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