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Organization: San Juan Citizen&#39;s Alliance

Title:

Comments: THIS COMMENT WAS SUBMITTED AFTER THE CLOSE OF THE COMMENT PERIOD

Dear James, Walt and Cam:

We appreciated the all-day excursion on Tuesday, Nov. 17 to contemplate well pads and pipeline routes around the northern HD Mountains. Nothing beats walking around and kicking dirt.

One area where we may have some shared perspective could be the proposed FGU #6-1 well pad next to the Munger's property. The alternative location farther east - with shorter access road, less clearing of dense mature oakbrush, lesser need for cut slopes, and still substantial vegetative screening - appears more environmentally preferential, depending upon feedback from the Mungers as well.

The obvious solution to us for the pipeline route would appear to be the so-called "two pipeline" alternative or more appropriately, an alternative that takes gas north and west. The distance west to Sauls Creek from the Federal #25A-1 is only a couple of miles to existing infrastructure, whereas the pipeline distance south from FGU #6-1 to Fosset Gulch looks to be five miles or more. The route west from Federal #25A-1 has much less impact on national forest resources than does the southern route through Little Squaw Creek. Additionally, as noted in the attached letter from Southern Ute Tribe to La Plata County planning department concerning the proposed El Toro compressor plant, the Tribe notes that there is ample existing compressor capacity by Red Cedar and BPX Energy west of the HDs.

The linear construction zone prohibition in the Colorado Roadless Rule was promulgated specifically to address this circumstance of a pipeline proposed through a roadless area on a No Surface Occupancy lease. We don't see how the Forest Service can comply with the letter or the intent of the rule and attempt to authorize the Petrox pipeline across the HD Mountains

roadless area on lease COC64935. The Colorado Roadless Rule is a regulatory constraint that precludes this route.

The alternative that skirts the roadless area to the east poses its own environmental challenges.

As the draft EA previously noted and as we observed for ourselves, that route is rugged with erosive soils, steep slopes and thick timber and doesn't seem very viable given the NSO stipulation and reclamation challenges. Perhaps there is still another option along Highway 160 corridor that could be more intensively explored.

The fundamental challenge it appears to us is that Petrox has acquired leases and proposed a development scheme that simply doesn't align with regulatory and topographic realities. Did Amoco (BP) originally drill the USA-Amoco Com AC #1 with the idea it would link to the Saul's Creek area to the west? It would be useful to understand the larger pipeline context surrounding the HD Mountains and what various options exist for collection and transport to markets. But as proposed, running a collection pipeline as Petrox suggests either through the roadless area or across rugged terrain is not viable.

Sincerely yours,

Mark Pearson

Jimbo Buickerood

Gary Skiba