Data Submitted (UTC 11): 5/5/2025 6:00:00 AM
First name: Michele
Last name: Brower
Organization:
Title:
Comments: I am submitting my comments as an objection to your draft/decision to approve the pipeline proposed for construction by TEP thru W. Mamm Creek Valley.

From reading the previous comments you must be aware of how much this area is valued by our community and yet the Forest Service and BLM are willing to throw our considerations aside for short term profit to enrich a Texas Oil and Gas company.

You have not addressed my concerns about the reputation of Terra as operator.

I consider this the overriding variable in what should have been a thorough process leading to your decision to degrade this remote and fragile area. The ECMC records show multiple spills from 2020 to 2025 including a Benzene leak days ago in the Dry Hollow area.

During the construction period of the Beaver Creek location that was granted to TEP, the foliage from the ground to the tree tops was masked in dust. TEP routinely ignores it's responsibility to manage the dust on the roads into it's locations. This method of management, however, generates another unacceptable impact on our community which is the dumping of our precious fresh water on our roads to tamp down dust. I asked Kirby Wynn at an ECMC listening session how much water was being taken for this practice. He had no idea.

During the construction phase of the Beaver Creek location a tanker truck servicing the TEP location rolled over 30' from Beaver Creek causing a fuel spill.

I share a fence line and access road with TEP. They cross my property line daily. Their fencing which has been in complete disrepair for the five years I have lived here has not once been addressed.

I am objecting to your lack of consideration of the reputation of this operator whose commitment to damage control seems dubious and who, because their interests are always placed above the interests of our community and our wildlife, have no respect for the residents or wildlife.

The ECMC reports do not address the multiple complaints made by GVCA to AQCC/CDPHE regarding methane leaks at the Rulison produced water plant. New info to be considered.

You not only ignored my concern for pipeline leaks into this pristine are, you ignored the concerns of many of the comments of our community members including Peter Hart of Wilderness Workshop citing the ECMC data base which speaks to undetectable releases from pipelines in remote areas. The data is referring to the leaks that occur in the winter months and result in decades of damage as the contamination is carried for long distances by ground water. From another reliable source I have learned that pipeline leaks are harder to detect and can go unchecked for years. I mentioned in my previous comments a concern for the extreme erosion which is generated by storm and winter runoff that I have witnessed in W. Mamm Creek. This makes effective construction remediation and the stability of the pipelines unpredictable. This erosion is severe redirecting creek beds and washing out creek crossings.

I am going to mention that I consider the content of over the 700 of the comments that I read as new information. The majority of these comment were opposed to this project. These comments included comments from EPA, Audubon Roaring Fork and other environmental professionals. I would like an explanation of how you factored the comments in and managed to dismiss the concerns of so many and the factual information of the scientifically

informed.

The requests for more current EA's were numerous. Requests for EIA's (including mine) dominated the comments of those opposed this project. Given the concerns of the community and the importance of the preservation of this area to this community, I am including the timeline of USFS studies relative to the letter presented to Lulu Colby describing TEP' intended project

This is the timeline I would like to challenge.

May 1 2023. Lulu Colby receives a letter from TEP describing their intention to establish up to 90 new wells in the area of her inholding of W. Mamm Creek.this included maps. 2021-July 2 2023. The dates of Surveys from West Water Engineers. WWEngineering conducted a biological survey during July of 2021 and follow up surveys during the 2023 field season.

2023. A YBCU visual habitat survey was conducted June 16, 2023 by Adam Perry and Murrelet Hallerman.

2024. A complete round of YBCU surveys were done on the potential habitat according to USFWS protocol. (no specifics provided) by certified biologists (not named).

No YBCU we're detected in the summer of 2024.

These survey dates do not suggest adequate time to establish a relevant EA on a project described variously as addressing the impacts of 90, 60 plus and up to 47 wells. Could USFS explain how this description of these studies fulfilled the standards described on the USFS website .

"For more than 100 years USFS has brought people and communities together to answer the call of conservation. Grounded in world class science and technologies and rooted in communities the USDA Forest Service connects people to nature and to each other."

Did the Review Officer visit W. Mamm Creek Valley?

Many were concerned about the fragmentation of wild life habitat as was I. This would not appear to be considered significant by USFS or SLM, ii would seem despite the aggressive fragmentation already inflicted on this area by TEP(Seaver Creek) and despite the SLM comment that there was a probability of wildlife mortality and dislocation during construction our concerns have been dismissed.

What was considered was TEP's estimate of truck traffic to be eliminated. Not an independent source.

What I am not seeing are any statistics regarding truck traffic for routine maintenance and work overs.

I was disturbed to see the comments of Kirby Wynn, paid by Garfield County to be a 'liaison' between the oil and gas industry and this community in which he touted the advantages of more oil and gas development in an area which is already supporting 11,000 wells(his number). And yet the community's request for more studies to 'fill in the gaps' left by SLM research on the impacts to public health and safely, to the welfare of wild life and wildlife resources seem to be discounted.

Our 'liaison', Mr. Wynn also presented the letter for approval of this project to the SOCC which they signed. To be clear the SOCC did not did write the letter of approval. TEP provided the SOCC this letter.

Mr Wynn also slated that the project would be submitted lo and reviewed under the stringent requirement of ECMC. At a listening session held by the ECMC, I was told by a Commissioner that there is an off-ramp for every

rule.

I believe that the fragmentation of this project between SLM and the US Forest Service has provided a convenient off ramp to dismiss the reality of the purpose of this pipeline which is to serve as a conduit for a large scale oil and gas development by TEP who has already compromised the natural resources of our area with 5000 wells. True, there is no drilling involved on USFS land but the cumulative impacts of this project must be considered in an area that is overburdened and degraded by this industry. There are no studies of the impacts to our watersheds.

I believe studies show that this area includes disproportionately affected residents.

And I believe that there are not enough funds to plug and remediate unproductive wells now and eventually this project will ultimately contribute to this unfortunate imbalance.

"The mission of the USDA Forest Service is to sustain the health, diversity and productivity of the Nation's forests and grasslands to meet the needs of present and future generations"

I do not believe you are meeting the moment. In this time when public lands are under attack and climate change is not being addressed in your decision, I object to your decision and ask for a reversal of your decision to no action.