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RE: The Orphan Wells and Abandoned Mines Project #60618

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Good day,

I am writing today regarding The Orphan Wells and Abandoned Mines Project #60618. While it is a worthy and necessary plan to cap orphan oil and gas wells, and reclaim abandoned mines, I am very concerned about the fact that the EA is significantly different than the proposal (“scoping” document), which was posted on August 10, 2021.

I understand that the current Environmental Assessment (EA), posted 12/20/21, exempts the Wayne project from critical environmental guidelines required under its own Forest Plan. Nowhere, in the proposal/scoping document is there mention of Wayne plans to request exemptions from Plan rules. Had there been, there would have been strong public evaluation and critique of the project when it was announced in August.

I see this type of obfuscation of the facts, on top of blatant disregard for essential land stewardship practices, as shameful on the part of the project management and Wayne executives. I implore you to find your moral compass. Do the right thing. Do your job. The plan must be rewritten.

The current plan is absurdly vague. Before this project can go forward, there are many details that must be specified and open to public comment, including the following:

1. How many wells have been capped/plugged under the current plan? What is their condition? What was the cost of each? Has the capping/plugging been effective? How much disturbance of soil, wetlands, and vegetation (quantified by carbon emissions, acreage, tree volume, species) was required to achieve these results?
2. How are the wells that are slated for intervention being prioritized? What are the environmental costs and benefits of each intervention (including GhG

emissions, destruction of habitat and wetlands, logging, road building, and soil compaction)?

3. Why hasn't the FS shared the maps and emissions data of wells to be plugged or capped? This must happen immediately.

Most sincerely,

Shelley Stark