Data Submitted (UTC 11): 6/19/2013 8:04:46 PM
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Organization: Colorads Springs Utilities
Title: Source Water Protection Project Manager
Comments: Thank you for the opportunity for Colorado Springs Utilities (Springs Utilities) to participate in the EIS process for oil and gas leasing in the Pike and San Isabel national Forests and Cimarron and Comanche National Grasslands.
The following comments pertain to the proposed stipulations related to controlled surface use for oil and gas development in public or community source water protection areas. In general, the stipulations offer adequate protection. However, as the purpose of the stipulation is to, “protect both surface and groundwater sources and infrastructure associated with them”, Springs Utilities would like to suggest more clarity around the protection of infrastructure and description of source water areas.

First is the vertical and horizontal design separation from utility infrastructure is essential when considering design, construction and operation of oil and gas facilities. Utilities would consider it sensible to have text added on vertical and horizontal design separation for Raw Water Transmission Mains (RWTM). This is due to the size and high pressure condition of the water mains. Springs Utilities provides set back requirements to County Building Departments and recommends the same be added to surface occupancy stipulations. The minimum horizontal separation between a RWTM should be at least twenty-five feet (25’) parallel to the outside edge of the easement. Additionally, a five feet (5’) or greater vertical separation would be suggested for crossings above water, electric or gas transmission lines for roads and driveways used by heavy equipment or transport vehicles. Furthermore, under no circumstances shall utility infrastructure be undermined such that its support soil is removed without utility owner approved support mechanisms in place.

Secondly, municipal water systems can consider protection measures for surface water sources within an area 5 miles upstream of intakes or to the upper boundary of the watershed, whichever is least. This area is consistent with the protection area that Colorado statue C.R.S §31-15-707(1) (b) allows municipalities to govern. Since the stipulation aims to protect community source water areas this clarification may be necessary to add especially in circumstances when waivers, exceptions and modifications (WEMs) are being considered.

Any feedback regarding the appropriate placement of Springs Utilities concerns in the stipulations or notifications would be appreciated. I look forward to participating in the next steps in the review process.

Sincerely,
Kim Gortz
Colorado Springs Utilities
Source Water Protection Project Manager