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Title:

Comments: PSICC Oil and Gas Scoping comment

Public Lands are accessed exclusively via County Roads maintained by Huerfano County, Colorado

The impact to our county can be documented with a roadway impact study funded by Boulder County. Although the counties demographics and finances differ I feel both counties face similar issues when it comes to future oil and gas development on public land.

The following data is documented in this study

boulder county oil and gas roadway impact study dc120003transpresentation20130124

roads boulder county oil and gas roadway impact study

January 2013

Final Draft

Table 7. Trip Generation Estimates pg 34

ACTIVITY1 PAD, 4 WELLS

Construction Stage

Pad and Road Construction 90

Drilling Stage

Drilling Rig 90

Drilling Fluid and Materials 270

Drilling Equipment (casing, drill pipe, etc.) 450

Completion Stage

Completion Rig 40

Completion Fluid and Materials 170

Completion Equipment (pipe, wellhead, etc.) 10

Fracturing Equipment (pump trucks, tanks, etc.) 320

Fracture Water 4,200

Fracture Sand 190

Flowback Water Disposal 1,400

Total Development Trips 7,230

Production Stage

Oil & Water Removal 580

Operations and Maintenance 150

Total Production Trips (per year) 730

The most frequent heavy truck activity during the development of a well comes from the transportation of water to and from the well during the drilling and hydraulic Fracturing process (completion stage).

With the number of truck trips per well documented at approx 8000 a year per well the impact to county roads that are designed and maintained for light traffic mostly passenger cars and an occasional horse trailer. The impact will be significant in terms of man hours and finances. These trucks are not passenger cars but 3 and 5 axle haulers which will cause significant damage to our county roads.

Safety Mitigation pg 52

In addition to the mitigation measures needed to offset the road deterioration, the study team identified measures

to address the safety of the study area roads. The safety mitigation is based on the need for shoulder widening to maintain safe multi-modal roads with the increased truck traffic associated with the oil and gas traffic. Wider shoulders provide space for bicyclists separate from the travel lanes. Shoulders also provide safety benefits for all roadway users: they serve as a countermeasure to run-off-road crashes and provide a stopping area for breakdowns or other emergencies. Using the County's inventory of shoulder widths and their roadway design standards, the study team identified those roadways in the study area with sub-standard shoulders. If oil and gas trucks were assigned to those roadways in any of the three development scenarios in the travel model, it has been assumed that expedited shoulder widening would be needed to improve the multi-modal safety.

The costs to widen the shoulders are based on the information presented in Table 14 . Some of the shoulders would require only partial widening (that is, a narrow shoulder exists) which is reflected in the two foot width unit prices for minor arterials and collectors.

Table 14. Shoulder Widening Unit Costs

Road Classification	Shoulder Width	Unit Price/Mile
Principal Arteria	16' (Full Width - Both Sides)	\$140,000
Minor Arteria	15' (Full Width - Both Sides) 2' (Partial Width - Both Sides)	\$100,000 \$40,000
Collector	4' (Full Width - Both Sides) 2' (Partial Width - Both Sides)	\$80,000 \$20,000

Although prices may vary between Boulder County and Huerfano county this gives a rough idea what cost our county may have to absorb with energy extraction industry development on public land in our county related to the fact that all of these lands require travel on county roads for access.

Maintenance and Rehabilitation Costs page 46

The County's average cost of a grading operation is approximately \$224 per mile each time the road is graded. The grading cycle within the County is dependent on the traffic volume of the road as well as if a dust suppressant can be applied. Some low volume, non-impacted gravel roads need to be graded only once every two months. However, if the road cannot be treated with a dust suppressant material (e.g., because of vertical grade, sensitive vegetation, etc.), the non-impacted, unpaved road may be graded up to two to three times per month.

The County's average cost per mile for graveling is \$44,200 per mile. This cost includes material, labor and equipment. Similar to the grading cycle, the graveling cycle within the County is dependent on the traffic volume of the road. For this study, the graveling cycle time is six years for non-impacted unpaved roads. For purposes of this analysis, all graveling intervals were converted to a base yearly interval. That is, since the County provides a six-year cycle, the costs were converted to a yearly graveling cost that corresponds to the traffic projections.

If oil and gas trucks use an unpaved road as a transportation route, the road will have to be treated with a dust suppressant material to satisfy the State's Regulation 1 requirements. The County's average cost utilized for applying a dust suppressant material to a non-impacted gravel road is \$2,100 per mile.

Once again cost may differ between Boulder county and Huerfano county but this is a very rough idea of financial burden our county would have to assume in light of energy extraction industry development using county roads to access public lands.

Other issues that will need to be address include:

Dust mitigation

air quality monitoring/mitigation.

noise mitigation

weed control.

trucks using county roads will have proper exhaust mitigating devices installed.

A Mandate imposed on any lessee requiring application for a conditional use permit in regard to travel on county

roads shall be imposed requiring any lessee to present a plan to address all issues concerning impact to county roads associated with land use issues of oil and gas development. A mandatory bond would be included in said plan.

I am aware that the USDA has authority that focuses on surface disturbing activities and EIS analyzes the effects of potential future oil and gas development but this public comment concerns the effect on our small financially strapped county. With the access to public land in our county exclusively by way of county roads I believe these comment should be seriously considered.

Respectfully submitted

Dale Lyons

Huerfano County resident