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Comments:
I am writing to offer comments on the draft Environmental Assessment for the Petrox Northern Extension Pipeline and Associated Fruitland Coal Gas Horizontal Drilling Project.

I oppose the proposed routing of the pipeline through the HD Mountains Roadless Area. The Roadless Area was established for the express purpose of protecting important fish and wildlife habitat, primitive recreation, naturally appearing landscapes, and sources of drinking water.
The Forest Service should not waive the existing lease prohibition against surface occupancy and use of the Roadless Area for this pipeline. The No Surface Occupancy stipulation was confirmed by the San Juan National Forest in 2007 explicitly to protect the Roadless Area character of the HD Mountains. Bulldozing a 60-foot wide corridor through the Roadless Area obviously violates the contractual terms against surface occupancy.

The Colorado Roadless Rule was adopted in 2012 and included a ban on new gas pipelines through roadless areas in areas where leases, like this one, prohibit surface occupancy. The Forest Service must obey the letter of the law, but even more so, comply with the spirit and intent of the roadless rule.

The Environmental Assessment contains numerous inaccuracies and deficiencies. It inaccurately claims the existence of roads in the Roadless Area, and it fails to evaluate the towering ponderosa pine forests for old growth character. Only by preserving existing stands of old growth ponderosa pine forest will we have this ecosystem for future generations. Roads create barriers for wildlife migration and connectivity of habitat.

The Forest Service should not authorize a pipeline through the Roadless Area, and should find better alternatives to accommodate the oil and gas industry.
I appreciate your consideration of my comments.