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Comments: Capping orphan wells and reclaiming abandoned mines are worthwhile actions if other conservation values of the land are protected. However, I strongly oppose the intention (stated in the EA) to ignore stipulations in the WNF Forest Plan that require protection of old-growth forests, wetlands, and sensitive species habitats, including those for the endangered Indiana bat. It is ludicrous for an agency to exempt itself from some aspects of a plan in order to comply with others.

The main reason to cap wells is to reduce methane emissions leading to climate change. It would be counterproductive to cut down old-growth forest in order to cap wells, since large trees play an outsized role in carbon storage compared to smaller trees. According to a peer-reviewed 2014 paper by Stephenson, et al. in the respected journal *Nature*, a single big tree can absorb the same amount of carbon in just one year as is contained in an entire mid-sized tree. Bill Moomaw points out that the largest 1% of trees in a forest store about half the forest's carbon. Preserving large, old trees is one of the most important things the USFS can do to combat climate change.

The project proposal lacks a lot of critical information. The public must be informed about the number, accessibility, and emission levels of the wells that will be plugged. This information is critical to evaluate the costs and benefits of the project. Public consultation is also needed before particular wells are selected for capping so that there is a chance to weigh in before site-specific decisions are made.