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Comments: Comments to the Wayne National Forest Orphan Well and Abandoned Mine Project EA 2022
Recently appropriated money will allow oil and gas wells within the Wayne National Forest to be capped. This is
a beneficial way to curb the methane emissions that are being released by these wells. What is not beneficial is
allowing the procedure to sidestep major environmental guidelines that are a part of the 2006 Forest Plan.
The Environmental Assessment issued on December 21, 2021 claims a need to exempt the plan that would
result in detriments to the old-growth forest, the endangered Indiana bats, wetlands, and other sensitive habitats.
Instead, the procedure will allow logging, road building, and heavy machinery to access the forested area. The
public was basically ignored when this exemption took place as the brief (30-day period) and the release date
(Christmas holidays) shows. The plan gives very little data and sites few peer-reviewed sources as guidelines for
the process. Some questions that remain are as follows.
*Where are the maps that would show the wells to be plugged? The wells that have been plugged? The areas
that would be affected by the proposed Plan exemptions?

*Where are the data to show the extent of emissions and pollution to be curtailed and the extent of the harm to
the Forest from Project activities?

*The EA refers to the Forest Plan for the guidance in this EA. There are no links or references to page numbers
that can be accessed to understand what guidelines or framework the EA refers to. A 16-year old Plan does not
offer any assurance that the best science practices for managing projects in the forest will be used, especially
when years of effort were put into a new planning process, a process then curtailed and dismissed by the Forest
Supervisor in 2021.

*The 2006 plan states that 128 abandoned wells would be cleaned up. The EA states that 200 wells and 100
mines will be reclaimed. How many of those 128 wells have been plugged and reclaimed, and where are they?

*The EA should have maps and locations of all the known abandoned wells and mines. Omitting that from the EA
leaves everyone completely in the dark about where projects could take place. This information is necessary to
be able to comment on whether the "design criteria" for a site chosen by the FS does in fact provide protections
to wildlife, plants, old growth, etc . Omission of this information demonstrates a profound lack of accountability by
FS.

*What were the costs and benefits of those projects in terms of forest impacts and emissions reductions? The
public should be able to look at the design criteria and analyses for those wells and mines to evaluate the
environmental impacts.

*There is no priority list for what wells and mines are most important to mitigate and why. There is no mention of
current impacts or impacts of remediation, such as methane emissions, ongoing unabated pollution and long-
term effects of that pollution, erosion, carbon emissions, introduction of NNIS, habitat loss, etc. The study cited
in the EA by Townsend-Small et al. 2016, does identify a few wells on federal lands that have measurable
methane leaks. ALL of the wells considered should be analyzed for level of methane leaks to understand their
current and projected contribution to environmental harm in relation to quantified harms of planned interventions.
WHERE ARE THE MAPS? Where is the data?

*"Targeting high emitters will lower mitigation costs per unit of methane emissions avoided. The identification of
abandoned conventional gas wells and plugged/vented gas wells as the highest emitters allows government

agencies to prioritize gas fields and coal areas in their mitigation efforts. Furthermore, explicit categorization of plugged/vented wells, which are found to be high emitters, in state databases may be useful. In addition to database analysis, noble gases, specifically low 3He/4He and high 4He/22Ne ratios, provide an independent approach to identify attributes of high methane-emitting abandoned wells." What criteria will be used to select wells? https://www.pnas.org/content/113/48/13636

*"Our early analysis shows that unsurprisingly deeper wells are more expensive to plug. But we'd also like to quantify how other factors shape plugging costs, such as the proximity to population centers, water bodies, and coal seams, along with other location-specific information." Have these factors been considered? https://www.resources.org/archives/plugging-orphaned-oil-and-gas-wells-what-we-know-and-need-to-know/

*There is no explanation of how extensively roads will be built or how they will be reclaimed. How many new roads will be needed? Will the gravel be removed? How will the roadbed be reclaimed? How will non-timber forest products be affected?
Again, even with the so-called design criteria, road building and its impacts are not adequately addressed in the EA. No one can believe that the average disturbance will only be 1.6 acres on a well site or 3 acres on a mine site that includes roads. Again, choosing a reclamation site needs to be identified before a project is chosen. There should be input from more than FS employees to take the hard look NEPA requires for decision-making. There are far too many unanswered questions and this procedure is being rushed along without the public input and the needed scientific data. What proof do we have that this entire procedure will do more harm to the WNF than good?