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Although surface issues for oil and gas development and production on private parcels fall under the jurisdiction of La Plata County, and those occurring on SJNF land falls under the jurisdiction of the USFS, the issues are essentially the same in both jurisdictions. In other words, the issues originate with the oil and gas development and production itself, and not with the location per se.

One issue of commonality is with regards to emergency response. A public comment on the topic was submitted to the Chapter 90 public comment portal and the file is available there. In essence it points out three major considerations.

1)It is essential to differentiate between an emergency that is confined to the OGF in question and therefore the response responsibility lies with the operator versus an emergency that may originate with the OGF but propagates outside its boundaries. In the latter case, emergency response may involve La Plata County or USFS resources as well as the OGF operator.

2)Because of those two different scenarios, two emergency response plans are necessary.

3)Emergency failures in pipelines can occur and an emergency response plan is appropriate for pipelines as well as OGFs.

The semi-isolated location of the Catamount Pargin MTN UT 2 OGL and subsequent six wells suggests that it is relatively important to develop suitable emergency response plans for both the wells/OGF and the 8.4 miles of pipelines serving them. That would seem to be the case especially for the wells since they will be positioned in the midst of a heavily timbered location with associated wildfire danger.

Can the Spring Creek project EA evaluate this matter and require the operator to provide plans?