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Comments: Ref: Catamount Spring Creek Project 63036 Scoping Letter 10/18/2022

Ref: 20221102 NSJB Stakeholders Meeting Notes JJB.pdf

Ref: National Geographic Topographic Map # 145 sold at Columbine Range Station

The map on page 6 of the Scoping Letter does not contain information outlining the 6.25 square mile gas reservoir depletion area referenced in the proposal description. As a result, it is not possible to determine the exact area that will be accessed by development and production from the current Catamount leases. The map does show the roadless area to the east of FS 537 and north of the Pargin MTN UT 2 location. The map also shows approximately 10 sections of SJNF land to the west of FS 537 that are not included in the roadless area. The map also shows the Archeological District with two active gas wells, one located immediately east of the current FS 537 corridor and one well about a mile to the west of FS 537 accessed via FS 123.

The presence of the 10 sections of SJNF accessible from FS 537 that would permit road and pipeline access and the two existing wells in the Archeological District immediately raise the question of potential future leases for new wells and re-work of existing wells using multi-lateral horizontal drilling techniques such as are planned for the Pargin MTN UT 2 project. Using the Pargin MTN UT 2 proposal as a reference, and a similar gas reservoir depletion area available in either of these two areas, this could imply an additional 12 or more new wells on future leases.

If either or both of these future possibilities may occur, then a number of questions might arise that are relevant to determining the scope of the current Catamount Spring Creek Project EA.

- 1) Will the de-watering pump jacks be powered by electric motors or by well head methane fueled engines?
- 2) If the choice would be electrification, then will distribution grid power lines be sized to carry the total demand of all potential Spring Creek wells and installed initially to avoid future disturbance of the Archeological District along the FS 537 corridor?
- 3) If the choice is methane fueled engines, then will the total impact of an additional 12 or more new engines be taken in to account in assessing potential impact and allowing such a choice for the current proposal?
- 4) Will the methane and produced water pipelines be initially sized and configured to accept connection and increase flow from additional wells?
- 5) Would the combined methane production from a total of as many as 18 wells require a supporting compressor station and if so would that station be permitted on SJNF land?
- 6) How will the impact of additional public access and use be addressed if new roads and pipeline corridors penetrate the 10 sections of SJNF west of FS 537 that allow new road construction?

In other words, is the potential for additional future wells accessed via FS 537 sufficiently great that it would be prudent to include an analysis of that eventuality in the EA for the current project to determine how, if at all, the pipeline and power infrastructure might be configured initially to minimize disturbance in the future? In addition, how will Best Management Practices be defined to deal with additional impacts from potential increases in public access?