

Data Submitted (UTC 11): 11/18/2022 8:22:03 PM

First name: Janine

Last name: Fitzgerald

Organization:

Title:

Comments: After visiting the Catamount site with Jaime Blair, I was reminded of the old days of the Northern Basin EIS. Although collaboration with the public/FS is much improved. Some great work has been done including consulting with tribes on archaeology and receiving MOUs. Yet some of the basic problems that we struggled through during the Northern Basin EIS were still present.

These included:

1) leasing without science into the availability of gas and the feasibility of directional/horizontal drilling in the HDs.

I was surprised that Jaime Blair had no knowledge of the fractured nature of the coals seams in the Spring Creek area or the success of horizontal wells in the area. We were also surprised that a discussion of the availability of gas was not available for the scoping letter that would allow a long a destructive pipeline to be built without this knowledge of whether is was needed.

2) The location of the beginning of the pipeline and placement of horizontal wells.

Despite a gigantic well pad (one of the biggest most of us have ever seen) already being built with one well head, there was no discussion or information as to why this well pad isn't the site of the proposed action. In addition the gigantic face of the well pad look like an erosion disaster that was on the brink of happening and had been perhaps been rapidly fixed before the public onsite. On the face of the wall there was a canal built to stop the water flow-with questionable issues as to where this water flow and what damage it may cause.

3)The roads climbing to the well pad under consideration

The road leading to Pargin Mtn Ut 2 is very steep and very narrow as the scoping comments note. It seems impossible to drive up there and not think that there will be major road improvement needed-mostly widening allowing for the double ditch pipeline to occur. We were not able to walk the area that will be disturbed to avoid most of the switchbacks but as we know in the HDs any disturbance is very problematic due to the extreme erosiveness of the soil. Weed control and establishing native grasses is extremely difficult and completely dependent on the summer rainfall. Similarly, Jaime Blair seemed to have no knowledge of what will happen to the pipeline where there are arroyos and water areas. (Will they be put underground? How will the be protected during flooding events? )

4)Problems with Well pad Pargin Mt. Ut 2-

This well pad will be widened (despite the existence of a huge well pad down below which needs repeating multiple time) and will require a tremendous amount of fill dirt. The pad will need to take soil from a fragile hillside and place is downside of the pad.

5) Additional many of the concerns raised in the Northern Basin EIS (sensitive Elk habitat, migratory birds, impact to water) needs to be reconsidered. Additionally impact to climate change should now be included in any NEPA action. Much has changed since the Northern Basin EIS and there is much additional science including impact of oil and gas drilling on wildlife, technology related to horizontal drilling, the impact on water of CBM development, coal fires issues etc. We also are much more aware of tree die off and fire danger.

Although I'm sure Catamount thinks that we already spent years discussing this in the Northern Basin EIS and minimal NEPA should be needed, a place as fragile as the HD mountains constantly needs scrutiny. Therefore any proposed action should have extensive NEPA - perhaps an EIS. There are other issues that should be considered as to what the success of the wells from the Northern Basin actions were, lack of resources from the FS for mitigation or enforcement of mitigation and changes in wildlife surveys.

Thank you very much for your consideration,

Janine Fitzgerald