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First name: John
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Organization:
Title:
Comments: To all in charge of the proposed drilling project;

As resident of Custer County and a semi-retired licensed professional geologist and hydrogeologist, I would appreciate your consideration and response to my comments.

First, FEMA regulations were promulgated to avoid exactly the type of activities that you are poised to permit without even considering the potential for irreparable unintended consequences. The granting of a categorical exclusion based on the similarity of this to some other project is, in my opinion, reckless as you have no hard evidence that the two areas are hydro-geologically comparable.
It very likely that, given the extent of land this project covers there are multiple localized aquifers containing multiple flow zones with multiple hydraulic head or pressures. By drilling the number of deep borings proposed for this project without some upfront local data you risk connecting multiple flow zones containing water of different quality. This can result in an overall degradation of the local resources which we all rely on for potable water.

Second, I am also concerned about the specific technique and materials that will be used to plug and abandon the borings after they are completed. If sections are left open or simply left with bentonite drilling fluids in them over time the drilling fluids will break down and, or be diluted by groundwater flow. This can result in the same scenario of degrading the overall water quality of the local aquifer(s).

Second, part B: Do you have someone in your organization with sufficient experience with this type of project reviewed the contractors' proposed specifications for this project. Generally drilling contractors will propose sometimes vague language that can be interpreted different ways. Careful review and comment can bring more clarity to the activities as both you (USFS) and the contractor view them. This is of high importance when unforeseen circumstances arise that threaten to impact the contractors schedule and jeopardize protection of the environment. Bottom line the devil is in the details.

Third, Do you really have the number of experience personnel that will be required to oversee a project of this scope? Multiple activities at more than one locations are most likely going to be on daily and for that matter nightly. No matter the stated good intentions and experience of your drilling contractors inevitably, when left unsupervised, they will opt for expedient rather than consideration of longer-term consequences. You should consider having oversight personnel on site AND on call 24 hours a day when drilling activities are ongoing. In addition, detailed daily(24Hour) records should be kept by the onsite personnel so that in the event of disputes the USDA will have an onsite professional record of the project.

Fourth, just a few more points to consider.
Have you had the company submit a Spill Prevention Plan for you review. Spill cleanup kits for example should be required on site as inevitably there will hydraulic oil lines blow under pressure and spraying on the ground. Someone in your organization will need to supervise the cleanup activity and document the cleanup and disposal of oil, or fuel, contaminated debris.

Also they should submit plans to control surface water run off protecting any surface waters on the site. What sort of mitigations have they proposed to control surface flow in the event of local flooding. While this is may seem unnecessary most of the year spring run off or summer thunderstorms as you know do result in local flooding conditions.

Contingency planning for such events as personnel injury and fire should documented beforehand with appropriate phone numbers of emergency personnel and organizations.

Thank you for the opportunity to comment and I look forward to any feedback you may have.

John Roland, P.G., PHg.