

# Protect the Dolores River Watershed and SW Colorado Communities from Large Scale Natural Gas Development

~ Comments due by November 25, 2011 ~

San Juan Public National Forest and the BLM have projected the development of approximately 1,800 new natural gas wells across 1,000 square miles of farmlands, canyons, mesas and upland forests bisected by the Dolores River in a new Supplemental Environmental Impact Statement (SEIS). The Gothic Shale gas play, detailed in the SEIS, centers on Dolores and Montezuma counties and will involve the development of nearly 1,800 horizontally drilled shale gas wells. These wells will require massive hydraulic fracturing, or “fracking,” along with accompanying pipelines, roads, compressor stations and other infrastructure. The SEIS and related documents are available at <http://ocs.fortlewis.edu/forestplan>

The Forest Service and BLM have a unique opportunity to create and follow a sensible and proactive management plan for the Gothic Shale play as the field is in an early stage of development with about 1/3 of the public land now leased for oil and gas. **YOUR COMMENTS are needed** to urge these federal agencies to “plan wisely” to minimize adverse consequences to regional citizens, wildlife and plant communities, water and air quality, cultural and historic resources, along with other important resources valued by both residents and visitors.

These are some of the critical components that must be included in the management plan:

## **AIR QUALITY - CUMULATIVE EFFECTS ASSESSMENT AND MITIGATION**

- It’s certainly no surprise that the Gothic Shale gas field development is NOT the only fossil fuels extraction project forecasted for the Four Corners area; there are thousands of oil, gas and CO2 wells already in operation and thousands more proposed. Unfortunately, the SEIS does not adequately reflect this reality, therefore it is critical that we insist on a final management plan that will 1) recognize and monitor the toxic air emissions from ALL of the regional fuel extraction projects (not just those generated from the Gothic), and 2) implement strict standards, regulations, caps, and mitigations for this new natural gas field, with the backdrop that air emissions produced by the Gothic will be **in addition** to our current regional air pollution challenges.

## **MINERAL LEASING**

- Areas to lease: areas with valuable and sensitive resources including critical wildlife habitat, rare plants, treasured viewsheds, recreational importance, and cultural significance should not be available for leasing. Lands made available to leasing should be protected with strict standards to protect ecological and landscape values such as no-surface occupancy stipulations.
- Phased leasing: leasable public lands should be made available to industry operators in a phased manner supporting a longer and sustained timeline for the field which will allow for planned and coordinated development.

## **PHASED DEVELOPMENT**

- Project development should be spread over a decades-long timeline that will both:
  - 1) prevent a “boom and bust” approach that exacerbates adverse effects by compressing hurried development into a short time span, and
  - 2) best supports a more healthy and sustained economic benefit with lessened negative impacts on local governmental infrastructure and services, air and water quality, and other important local resources.

## **AIR AND WATER QUALITY**

- Support comprehensive and stringent regulations to insure no further degradation of our air and water resources including requiring the newest and cleanest technology for all gas field operations. Such measures include closed loop drilling, high efficiency compressors/pumps, methane capture, renewable energy power sourcing, low or no-bleed pneumatic controls, solar-powered telemetry for well field data, and others.
- Monitoring should be instituted immediately to determine the current status of air quality and a modeling program must also be instituted to better understand how the additional air pollutants from the Gothic Shale field can be both minimized and mitigated. We desire no increase in our regional ozone levels.
- Evaporation ponds for flowback and produced fluids should be prohibited and wellsite pits should be minimized along with a prohibition of on-site pit burials.

## **SPECIES PROTECTION**

- Strong and adequate regulations must be included to protect rare and threatened animal and plant species including ongoing habitat monitoring, permanent area closures for high value habitat, seasonal closures to protect wildlife habitat, and migration corridor protection.

## **PUBLIC HEALTH AND SAFETY**

- Insuring the health and well-being of southwest Colorado’s residents and visitors must be paramount. Detrimental effects such as reduced air and water quality, degraded infrastructure, over-burdened emergency response systems, and other negative effects are not acceptable and must be prevented through wise planning by the agencies.

**Comments must be postmarked by November 25, 2011** and may be made via:

- E-mail: [comments-planrevision-sanjuan@fs.fed.us](mailto:comments-planrevision-sanjuan@fs.fed.us);
- Mail: SJPL Supplement Comments, Attn: Shannon Manfredi, 15 Burnett Court, Durango, CO 81301-4216; or
- Fax: 970-375-2331.

For more information contact Jimbo Buickerood, Public Lands Coordinator, San Juan Citizens Alliance, [jimbo@sanjuancitizens.org](mailto:jimbo@sanjuancitizens.org), 970 565-7191, ext. 3.