

The San Juan Public Land's long-awaited Supplemental Environmental Impact Statement (SEIS) to their draft Land Management Plan was finally released to the public on August 26. The document's release gives us a look at the agency's proposed management of the anticipated Gothic Shale natural gas play, located primarily in Montezuma and Dolores counties. The public comment period, **open until November 25**, will allow all of us to provide input towards the formulation of the agency's planning for the gas play. The SEIS, including a map of the play area, is available at <http://ocs.fortlewis.edu/forestPlan/supplement/cover.htm>

The SEIS includes an increase in the Reasonable Foreseeable Development (RFD) for natural gas development on San Juan Public Lands to nearly 3,000 wells with an additional 1,769 wells being the estimated increase for the Gothic Shale play area. Obviously the shale play development constitutes a threat to an array of natural resources with the potential wells being punched through hundreds of square miles of public land on either side of the Dolores River Canyon utilizing hydraulic fracturing (fracking).

Two critical overarching questions stand out after our read of the SEIS – how many wells and over what timeframe will they be drilled? While the RFD notes about 1,800 wells, such calculations are filled with unknowns and the ultimate number of well could be much higher, hence – the best planning scheme must anticipate a well count that could double or triple the RFD's estimate. Obviously, the size of the field correlates directly with the impacts including two elements of which we have huge concerns, air and water quality (noted below).

The relative pace at which field development occurs would be very closely related to the severity and longevity of the negative impacts from the development. If the agency fails to regulate and structure the development when the "go" button is pushed (perhaps by higher gas prices or increased extraction capabilities) then the timeline could resemble a "boomland" scenario. We firmly believe that the boomland scheme should be avoided, rather, a planned and tightly structured development scenario can likely provide the greatest overall benefits with the fewest detrimental project-caused effects. Any type of pell-mell approach exerts unneeded and excessive pressure on local infrastructure and services, water resources, wildlife, air quality, public safety, housing, etc. that has been documented as ill-conceived and preventable.

San Juan Public Lands has the golden opportunity to appropriately plan for the Gothic shale play before the pressure to develop the field comes intense through a couple key mechanisms. As "only" about one third of the public land is now leased within the Gothic area, the agency can control the roll out of development by adjusting the availability of leasing lands for drilling – this approach has been used elsewhere in the West. As well, specific project activities (drilling wells, laying pipelines, installing well-field machinery, tanker trucking, etc.) can be adjusted to an appropriate level that allows for field development while minimizing the negative effects on the human community and natural landscape. We all know **too well** of

the dozens of communities and landscapes across the country that have been thoroughly abused by unplanned, unchecked and unconscionable (at least to many of us) development, however, there is **absolutely zero reason for that to be the modus operandi on the Gothic.**

The potential for further degradation of the Four Corner's airshed is alarming as the Gothic shale wells and related infrastructure would compound the adverse effects to local air quality (VOC's, sulfur and nitrogen emissions, ozone, dust, venting, flaring, etc.) caused by the thousands of wells in southwest Colorado and northwest New Mexico. Though we have not yet completed our technical review of the Air Quality Analysis Technical Support Document (an addendum to the SEIS), our initial concerns include the agency's apparent timidity to address ozone modeling from the get-go of field development. As the Gothic shale play's air impacts are in addition to all of the power plants, machinery, and vehicles already spewing pollutants in our regional 'hood – the agency must monitor and initiate modeling to best understand the air quality situation **from the start.** Unfortunately all too often some federal agencies constrain their thinking and planning by state and other regulatory boundaries; obviously birds, fish, water and molecular structures carried by the wind find these boundaries to be artificial and we fervently hope that the BLM and EPA can see it the same way by addressing the human and environmental concerns in a bioregional context.

The story surrounding the intensive and often problematic consumption and “disposal” of water for natural gas drilling that uses fracking technology is becoming increasingly known across the nation. Fracking operations per well require millions of gallons of water, some of which is reusable and much of which must be disposed; a challenge that is heightened due to the industry's general reluctance to share with all of us the varied ingredients of their fracking “cocktails.” Common sense tells us that it's nearly impossible to make wise decisions about the disposal of these fluids if we don't know what they contain. An industry leader's assertion that the ingredients used in fracking are common “under the kitchen sink” ingredients has been proven to be less than the truth. One has to ask - what does the human and environmental toll need to be before the industry morphs from being part of the problem to being part of the solution?

We have numerous questions about the source water... Where will it come from? Will its use detract from agricultural and domestic needs? How will it be transported? Can much of it be reused and therefore what is the potential water consumption annually? Also, there are numerous questions about the flowback fluids (injected fluids that are later pumped out of wells) and who how they will be handled – will water-saving “closed loop” drilling be required for all wells and/or will evaporation “ponds” be employed? Will produced water be piped/trucked to evaporation ponds or injections wells? Will the produced water be monitored for naturally occurring radioactive materials (NORMs) and other toxins? What will the “guarantees” be to protect near-surface aquifers? And there are others; certainly the

Alliance with our partners will push for comprehensive safeguards for water as well as mechanisms that reduce water consumption.

The SJCA website will provide continually updated information regarding our review of the SEIS and suggested comments until the comment deadline of November 25. Comments can be mailed to: SJPL Supplement Comments, Attn: Shannon Manfredi, 15 Burnett Court, Durango, CO 81301-4216 or e-mailed to [comments-planrevision-sanjuan@fs.fed.us](mailto:comments-planrevision-sanjuan@fs.fed.us) Please contact Jimbo Buickerood for further information at [jimbo@sanjuancitizens.org](mailto:jimbo@sanjuancitizens.org) or 565-7191.