Letter 84

Jim Cooper
PO Box 1551
Paonia, CO 80428

June 23, 2003

VIA FAX
Project Manager
GEC Exploration Drilling Project
P.O. Box 1030
Paonia, CO 81428

To Whom It May Concern:

84-1 I am writing as a Delta County resident to comment on Gunnison Energy's Exploration Drilling Project. The exploration of natural gas in Delta and Gunnison Counties is a logical and reasonable extension of this area's long and proud tradition of resource extraction. For over one hundred years the North Fork Valley has produced clean burning coal and it now appears that this region may produce even cleaner natural gas to help power the United States. There are some who say that natural gas exploration is not "compatible" with community values- I disagree. Coal mining has been, is and will be an important part of this region and so could be natural gas production. Natural gas exploration is necessary to determine what the future of gas production in this region is. Responsible natural gas production will be an economic boost to Delta County- a needed economic boost.

Please approve Gunnison Energy's exploration wells without unneeded & costly mitigations.

Thank You for Your Consideration,

Jim Cooper

Jim Cooper

Letter 85

To whom it concerns, Project Coordinator June 23, 2003

85-1 I am writing to encourage you to reconsider approval of the gas wells being proposed by GEC at this time. It does not seem that potential environmental problems have been addressed adequately at this time for the current wells being proposed and especially not in regards to the 600 others that seem to be looming in the future.

85-2 The lack on GEC's part to hold themselves accountable if there would be hydrological degradation etc. is unacceptable. It is also an indicator regarding their confidence in what they are doing to not cause water quality and other environmental disasters. The upsets caused by this production in regards to wildlife, air and noise pollution, and quality of life in the surrounding areas within the county are not addressed adequately as well. The history on the part of gas production companies does not bode well for the industry. The blatant disregard on the part of this industry to properties, bordering lands, and water sheds is appalling. In these instances they have also given the impression that they were committed to respectful taking of gas resources.

85-3 I attended several meetings with GEC employees speaking. The background and experience of those engineers heading up the exploration in this project proposal is not comforting by any means.

There is so much at stake for this region I implore you to please set high protective standards, and accountability on the part of GEC before taking this next step. There is too much at risk to do otherwise. I have gained great respect for what our county commissioners have done to help insure protection of this area to the extent they are able. I hope that you will take every precaution also to avoid the extreme downfall and degradation that is potentially at risk in this area in regards to this project.

Sincerely and Respectfully,

Carol R. Pierce

Carol R. Pierce
1720A Hwy. 133
Paonia, CO 81428

06/01/2003 17:29 9705273871 PAONIA PUBLIC LIBRAR PAGE 01

Letter 86

Dear U.S. Forest Service:

I am worried about natural gas prices and the threat of yet another recession this winter brought on a lack of supply of natural gas.

86-1 Alan Greenspan said, "You have to drill a well to find it." Let me just say it is time the Forest Service and BLM let Gunnison Energy drill the wells.

I quickly reviewed the EA available online for possible impacts from the eight wells and found no real impacts. This seems like the ideal project for exploring for much need natural gas. Let the applicant go forward with as few obstacles as possible.

Sincerely,

Michael Ushkow
21 Main Pkwy
Plainview, NY 11803

Letter 87

June 23,2003 From Jane Anderson, 3622 N Rd, Hotchkiss CO

Robert Storch
Supervisor GMUG National Forest
C/O Project Mgr. GEC Exploration Drilling Project
Box 1030, Paonia, Co. 81428

Dear Mr. Storch:

87-1 I hope you take seriously the sentence in the EA Vol 1 "The Forest Supervisor of the GMUG must decide the terms and conditions under which GEC may occupy and explore on its oil and gas leases *while protecting natural resources and providing for public access and safety " - etc.* At all of the CBM developments I know of in Wyoming, Colorado, and New Mexico the natural resources were NOT protected by the government officials appointed to do so. When dead deer and elk turn up after drinking the contaminated "water" at the well sites you will have to answer for this. The dead animals in New Mexico certainly had no protection. The concerned environmental community here in Delta County certainly will be organized to watchdog your functioning as the protector of our National Forest no matter what the present Washington Administration directs.

87-2 The EA for these 8 wells should address the total impact of 600 for you know once started, if there is methane obtainable there will be no stopping the pressure to continue to drill. . This document is simplistic in minutely addressing all the details of the 8 well sites without foreseeing the larger future picture.

87-3 Required bonds are extremely inadequate in addressing what significant damages could occur to OUR National Forest. Court costs are not cheap!

87-4 I need not address all of the details of the EA for GEC but am very concerned that this EA does not address any of the long term most important details all because of George Bush's myopic directives to the BLM and the Forest Service personnel. -Sincerely, Jane Anderson

Jane C Anderson M.D.

Letter 88

Project Coordinator
Gunnison Energy Corporation Coalbed Methane Gas Drilling Project
PO Box 1030
Paonia, Co.81428
FAX (970) 527-4151

I am writing in response to the Environmental Analysis released for the proposed drilling of coal bed methane wells on public lands in Delta County, and would like my comments to go on record.

88-1 My first and most obvious response from the research I have done is that there has never been a comprehensive study of the impacts (long, short, or cumulative) of coalbed methane drilling and development. The Environmental Impact Studies on natural gas drilling are not necessarily valid for all gas drilling and development. I would like to request a complete Environmental Impact Statement, or at the minimum amend your Resource Management Plan to address the unique impacts specifically to coal bed methane development.

88-2 Next I would like to address the fear I have concerning the impacts to our local region and lifestyle. I feel our county is already producing energy from our public lands in the form of the underground coalmines. We have supported this kind of extractive development, and do our best to live with the impacts. Now we are being asked to accept and industry with a poor track record. The stories from other counties are pretty scary! Although Gunnison Energy's parent company is trying to be a good neighbor, it was not necessarily by their own choice. Gunnison Energy has NO track record, or anything to loose if anything goes wrong. Where as my and my family's home, and lives are on the line here, we have invested everything we have. The current bond requirements will not cover the costs of much. The BLM and USFS need to require bonds that cover the FULL costs of reclamation. These costs should never have to be covered by the taxpayer.

88-3

88-4 Last, if this project is approved after further study, I would ask that the best available technology and the most stringent mitigations be required at all drill sites. The impacts to wildlife and public use that is non-extractive, will be felt even if low-emission generators, noise mufflers, dust suppression an all the access roads, well heads that blend into the environment, fencing and nets to safeguard wildlife access are used. The road use impact alone sounds devastating!

Please use your expertise to research these impact issues and manage our public lands for their best uses. Thank you.

Sincerely,

Denise Claire Laverty
PO Box 65
Paonia, Colo. 81428

Letter 89

Project Coordinator
Gunnison Energy Corporation Coalbed Methane Gas Drilling Project
PO Box 1030
Paonia, Co.81428
FAX (970) 527-4151

June 23, 2003

I am writing in response to the Environmental Analysis released for the proposed drilling of coal bed methane wells on public lands in Delta County, and would like my comments to go on record.

89-1 My first response from the research I have done, is that there has never been a comprehensive study of the impacts (long, short, or cumulative) of coalbed methane drilling and development. The Environmental Impact Studies on natural gas drilling are not necessarily valid for all gas drilling and development. I would like to request a complete Environmental Impact Statement, or at the minimum amend your Resource Management Plan to address the unique impacts specifically to coal bed methane development.

89-2 I would also like to address the fear I have concerning the impacts to our local region and lifestyle. I feel our county is already producing energy from our public lands in the form of the underground coal mines. We have supported this kind of extractive development, and do our best to live with the impacts. Now we are being asked to accept an industry with a poor track record. The stories from other counties are pretty scary! Although Gunnison Energy's parent company is trying to be a good neighbor, it was not necessarily by their own choice. Gunnison Energy has NO track record, or anything to loose if anything goes wrong. Where as my family's home, and lives are on the line here, we have invested everything we have. The current bond requirements will not cover the costs of much. The BLM and USFS need to require bonds that cover the FULL costs of reclamation. These costs should never have to be covered by the taxpayer, if the company bails out.

89-3

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Please use your expertise to research these impact issues and manage our public lands for their best uses. Thank you.

Sincerely,
Tony Peters
PO Box 65
Paonia, Colo. 81428

Letter 90

Project Coordinator
Gunnison Energy Corporation Coalbed Methane Gas Drilling Project
PO Box 1030
Paonia, Co.81428
FAX (970) 527-4151

June 23, 2003

I am writing in response to the Environmental Analysis released for the proposed drilling of coal bed methane wells on public lands in Delta County, and would like my comments to go on record.

90-1 My first response from the research I have done, is that there has never been a comprehensive study of the impacts (long, short, or cumulative) of coalbed methane drilling and development. The Environmental Impact Studies on natural gas drilling are not necessarily valid for all gas drilling and development. I would like to request a complete Environmental Impact Statement, or at the minimum amend your Resource Management Plan to address the unique impacts specifically to coal bed methane development.

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Please use your expertise to research these impact issues and manage our public lands for their best uses. Thank you.

Sincerely,
Moni Slater
3246 L 50 Lane
Hotchkiss, CO 81419

Letter 91

To: Liane Mattson, USFS Project coordinator
Re: EA on Gunnison Energy Exploratory Gas Drilling Project
Date: 6/23/03
From: Janet Starr PO Box 1090 Cedaredge, CO 81413
Comments on the EA for **GEC's** proposed exploratory gas drilling project:

91-1 1. The BLM and Forest Service need to conduct a full **EIS** and not permit these wells in such a piecemeal fashion.. Impacts to the regional hydrology, air quality, wildlife and local economies, especially tourism, hunting and fishing and other impacts unique to coal bed methane development must be fully explored.

91-2 2. I support the **No Action Alternative** for both Leon Lake wells #4 and #5 whose operation plans make exceptions to the stipulations on distance from the high water levels of ponds as stated in the **1993 Oil and Gas EIS**. Leon Lake #5 is planned for only 97 feet from an intermittent stream, when 500 feet is stipulated.

91-3 If a permit is granted, however, these wells should be directionally drilled in order to comply with those stipulations. Also, the proximity of Leon Lake #5 to FS 127 goes against the Oil and Gas EIS stipulations and is unacceptable.

91-4 3. **Trucks** on Highway 65 will be a hazard to the safety of the population, the school children and the elderly. **Noise** from truck brakes detrimental to the community.

91-5 4. **Elk**: Page 3.6-14: The potential for displacement of elk in the 2 Leon Lake sites, where their calving area will be disturbed is of major concern. This could cause substantial declines in elk reproductive success.

91-6 5. **Seismic Hazard**: Page 3.3-9, under **Induced seismic hazards** states that section 3.3.4 discusses monitoring that would be performed if a fault is encountered in fracturing operations. However, section 3.3.4 on page 3.3-15 says "no mitigation measures have been identified for geological resources". **These statements are in conflict with each other.**

91-7 6. **PCA(Potential Conservation Area)** Page 3.5-3 Surface Creek PCA is .25 mile from the Leon Lake #4 well. This PCA is important to the hydrology of the Grand Mesa and to its riparian community. Again, **I urge No Action on Leon Lake #4.**

91-8 7. **View sheds**: The lower portion of the Grand Mesa Scenic and Historic Byway will be visually impacted by Leon Lake #4 and #5, as stated on page 3.8-

91-9 8. **Hydraulic fracturing:** Page 2-17, section 2.12.3 states "It is anticipated that there typically would be one or two hydraulic stimulations per well. Typically, it is possible that there could be as many as six to eight hydraulic stimulations in each well." **These statements are contradictory, and the difference in potential impacts with increased fracturing would be significant.**

Janet Starr

Letter 92

To: Liane Mattson, USFS Project coordinator
Re: EA on Gunnison Energy Exploratory Gas Drilling Project
Date: 6/23/03
From: David Starr PO Box 1090 Cedaredge, CO 81413
Comments on the EA for **GEC's** proposed exploratory gas drilling project:

92-1 1. The BLM and Forest Service need to conduct a full **EIS** and not permit these wells in such a piecemeal fashion.. Impacts to the regional hydrology, air quality, wildlife and local economies, especially tourism, hunting and fishing and other impacts unique to coal bed methane development must be fully explored.

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DMS 6/23/03

Letter 93

To: Liane Mattson, USFS Project coordinator
Re: EA on Gunnison Energy Exploratory Gas Drilling Project
Date: 6/23/03
From: Roy M. Broadbooks, Box 95, Cedaredge, Co 81413
Comments on the EA for **GEC's** proposed exploratory gas drilling project:

93-1 1. The BLM and Forest Service need to conduct a full **EIS** and not permit these wells in such a piecemeal fashion.. Impacts to the regional hydrology, air quality, wildlife and local economies, especially tourism, hunting and fishing and other impacts unique to coal bed methane development must be fully explored.

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Thank You!
Roy M. Broadbooks

Letter 94

To: Liane Mattson, USFS Project coordinator
Re: EA on Gunnison Energy Exploratory Gas Drilling Project
Date: 6/23/03
From: Dea Jacobson, Box 95, Cedaredge, Co 81413
Comments on the EA for **GEC's** proposed exploratory gas drilling project:

94-1 1. The BLM and Forest Service need to conduct a full **EIS** and not permit these wells in such a piecemeal fashion.. Impacts to the regional hydrology, air quality, wildlife and local economies, especially tourism, hunting and fishing and other impacts unique to coal bed methane development must be fully explored.

94-2 2. I support the **No Action Alternative** for both Leon Lake wells #4 and #5 whose operation plans make exceptions to the stipulations on distance from the high water levels of ponds as stated in the **1993 Oil and Gas EIS**. Leon Lake #5 is planned for only 97 feet from an intermittent stream, when 500 feet is stipulated.

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94-8 7. **View sheds**: The lower portion of the Grand Mesa Scenic and Historic Byway will be visually impacted by Leon Lake #4 and #5, as stated on page 3.8-7.

94-9 8. **Hydraulic fracturing:** Page 2-17, section 2.12.3 states "It is anticipated that there typically would be one or two hydraulic stimulations per well. Typically, it is possible that there could be as many as six to eight hydraulic stimulations in each well." **These statements are contradictory, and the difference in potential impacts with increased fracturing would be significant.**

Thank You!
Dea Jacobson

Letter 95

FROM THE DESK OF:
Carl Ecklund
Box 813
Frisco, CO 80443

FAX#: (970) 527-4151
To: Project Manager
RE: GEC Exploration Drilling Project

Dear Project Manager:

95-1 Because of the late date I do not have time to express more comments, but I would like to state the EA seems to verify the proposed gas exploratory wells can go forward in a responsible, environmentally sound manor.

I suggest the Forest Service and BLM approve all of the wells for exploration.

Sincerely,

Carl Ecklund
Box 813
Frisco, CO 80443

Letter 96

Dear Sirs,

96-1 I am writing in regards to the Natural Gas Exploration on Colorado's Western Slope.

I am running out of time on the comment period, but I want to quickly register my support for all eight exploratory wells without extensive requirements.

I feel the project should go forward in the environmentally responsible manner laid out in the Environmental Assessment of the proposed action.

Sincerely,

Greg Wanner
P.O. Box 4311
VAIL CO. 81658

Letter 97

Project Manager
GEC Exploration Drilling Project
P.O. Box 1030
Paonia, CO 81428

Dear Project Manager:

I apologies for the brief comments, but I spent my time reviewing the Environmental Assessment for the 8 wells.

97-1 To keep it short, I find no environmental obstacles which would justify denial of the application by Gunnison Energy. I support letting them go forward on all eight wells in as cost effective a manor as possible. Thank you.

Liz Reschly

Liz Reschly
2620 Holly St.
Denver, CO 80207

Letter 98

Project Manager
GEC Exploration Drilling Project
P.O. Box 1030
Paonia, CO 81428

Dear Sirs,

Please register my support for approval of all eight wells proposed for exploration by Gunnison Energy.

98-1 Natural gas prices are on the rise and we need more supplies. This project meets President Bush's Energy Plan for more domestic supplies and I see no environmental impacts in the proposed EA, which I found to be very informative.

Please approve all eight wells.

Sincerely,

BRUCE BUTLER
P.O. BOX 2109
SILVERTHORNE, CO 80498

Letter 99

USFS Project Manager
Paonia, CO

To Whom It May Concern:

99-1 I am sorry for not providing more lengthy comments, but I would like to go on record supporting Gunnison Energy's application for 8 wells.

I see no major environmental concerns and the report lists "no impact" on most issues I am interested in.

Thank you for your hard work,

Mary Beth Ottley
0747 Founders Way
Eagle, CO

Letter 100

"Kim Kaal"
<kimkaal@cordcomp.com>
06/23/2003 02:29 PM

To: lmattson@fs.fed.us, lynn_lewis@blm.gov, kathy.hall10@attbi.com
cc: kimkaal@cordcomp.com, craigmeis@cordcomp.com
Subject: Submission of GEC EA Comments

Dear Project Manager,

100-1 Thank you for the opportunity to comment on Gunnison Energy Corporation's Proposed Exploratory Gas Drilling Project Environmental Assessment (EA).

I have read this EA in its entirety and have concluded that it is very well written and thorough. It is obvious the team working on this EA has put a great deal of effort into the process of writing this EA, and is reflected in the quality of the work in this document. I feel the individual(s) responsible for making decisions based upon this proposal should feel confident the resulting decisions to be made will not only meet the intent of the Federal Government Regulations regarding mineral exploration activities, but will also be beneficial to the operator, and the economics of Western Colorado in general.

I have complete confidence from working closely with Gunnison Energy Corporation personnel, that this operator will be a very environmentally responsible operator and will be absolutely vigilant in complying with any and all Conditions of Approval stipulated by the US Forest Service and Bureau of Land Management (BLM).

100-2 The issues and impacts from this exploratory drilling proposal appear to be more than adequately considered and evaluated and thus documented in this EA. Therefore, I do not believe this exploration drilling proposal will adversely impact the environment, or the residents of Western Colorado. In fact, I believe the potential for economic benefit from this proposal far outweighs any potential negative environmental impact.

100-3 Additionally, this proposal complies with the Grand Mesa, Uncompahgre and Gunnison Land and Resource Management Plan, as amended by the Oil and Gas Leasing Final Environmental Impact Statement; and the BLM Uncompahgre Resource Management Plan, and appears to more than adequately comply with all applicable federal, state and local regulations. Finally, this exploratory drilling program has the potential to assist in achieving the objectives of the National Energy Policy's stipulated requirement for a "steady, reliable supply of energy (natural gas) for America's homes, businesses and industries."

Again, thank you for the opportunity to comment on this proposal.

Sincerely,
Kimberly J. Kaal
Project Geologist
Cordilleran Compliance Services
826 21 ½ Road
Grand Junction, CO 81505
Phone: (970) 263-7800
Fax: (970) 263-7456

PAONIA RANGER DISTRICT
ACTION DATE
JUN 2 3 2003
DISTRICT RANGER
MINERIALS
LANDS/ENG
RANGE
WILDLIFE
GDA
DBM/DBM ASST
LEO
TIMBER

Letter 101

jackson perrin
<jrperrin@yahoo.com
>

06/23/2003 05:49 PM

To: lmattson@fs.fed.us
cc:
Subject: proposed gas wells on forest service land

Dear Honorable Ms. Mattson

I wish to state for the record that I am opposed to the proposed eight coalbed methane wells on forest service land for the following reasons:

101-1 1. I believe this type of extractive industry is incompatible with the values held by the residents of this valley.

101-2 2. More research needs to be done concerning the effects on groundwater before drilling ensues.

101-3 3. Bonds to insure full reclamation should be procured before drilling begins.

Thanks alot,

Jack Perrin
3897 P Rd.
Paonia, CO
527-6352

Do you Yahoo!?
SBC Yahoo! DSL - Now only $29.95 per month!
http://sbc.yahoo.com

Letter 102

Lulu Volckhausen
<alulu@paonia.com>
06/23/2003 08:05 AM
Please respond to alulu

To: Liane Mattson <lmattson@fs.fed.us>
cc:
Subject: Comment

102-1 Dear Liane, We are opposed to any gas or oil drilling in the Forest Service lands on the Grand Mesa and in Delta County. All we have is the serenity and beauty of the mountains you that live in the cities can't understand this and have no way to judge the value of it. Trust us. The road use alone will have devastating impact. Of course it's a great excuse for the spending of more federal funds to maintain them and use chemicals such as mag-chloride to further abuse the land. Time is running out save what you can. Thank you. Lulu and Phil Volckhausen, PO Box 111, Paonia, Colorado 81428 e-mail alulu@paonia.com

102-2

2003
DISTRICT RANGER
RECREATION
LANDS/ENG
RANGE
WILDLIFE
GDA
DISTRICT ASST
CRD
OTHER

Letter 103

"Peggy Herzog"
<peggy@paonia.com>
06/23/2003 01:05 PM

To: lmattson@fs.fed.us
cc:
Subject: No to coalbed drilling

Project Coordinator
P.O. Box 1030
Paonia, CO 81428

Dear Sirs,

103-1 As a local resident, I am deeply concerned about coalbed drilling activities. Drilling into coalbeds should not take place without a long-term, comprehensive study of effects on the area's hydrology, air quality and wildlife. The BLM and Forest Service should be taking the lead in this effort, and examining all of the effects of energy extraction, and not just evaluating each project individually. The current studies are incomplete and rely on outdated information.

Several things that must be considered before coalbed drilling proceeds:

103-2 1. At a minimum, the BLM and the Forest Servcie MUST require bonds that cover the FULL costs of reclamation.

103-3 2. The best technology and mitigation efforts MUST be required at all drill sites and access routes, including efficient, low-emission generators, noise mufflers, dust suppression on all access roads, use of energy efficient dynapumps, and fencing which will prevent wildlife from becoming mired in drilling pits.

103-4 3. This forest already supports energy development with three underground mines. The forest's multi-use mission must be suitably diversified, supporting public interests other than energy development. The Forest Service should be demonstrating support of natural resource values, not undermining them.

103-5 As a public citizen and a local resident who will be greatly impacted by these drilling activities, I urge you to require the basic minimums stated above. Support of this wildly misguided project will cause great environmental harm. We will by paying the price for this foolishness for several generations.

Sincereley,

Peggy Herzog
P.O. Box 1225
Paonia, CO 81428
(970) 527-3422

PAONIA RANGER DISTRICT
ACTION DATE
JUN 2 3 2003
DISTRICT RANGER
MINERIALS
LANDS/ENG
RANGE
WILDLIFE
GDA
D&M/D&M ASST
CEO

Letter 104

"Craig Meis"
<craigmeis@cordcomp.com>

06/23/2003 10:39 AM

To: lmattson@fs.fed.us
cc:
Subject: GEC Exploration Drilling Project

Dear Project Manager:

104-1 I would like to respectfully submit my strong support of Gunnison Energy's proposed natural gas exploratory program following a complete review of the associated Environmental Assessment. The EA was very comprehensive and complete with lease stipulations and existing applicable regulations affording full protection of human/wildlife health, safety, welfare and environment. The extensive pre-exploration water research conducted and referenced in the EA support my comments specifically considering the research findings and that no similar research of this extent has ever been conducted for a natural gas exploration project to my knowledge.

104-2 Based upon the findings and research of the water study and the statement made in the Water Resources section of the EA suggesting a "no impact" conclusion, I do find that the groundwater mitigation measures specifically associated with WR-5, WR-6 and WR-12 are very unnecessary and do not afford any more protection than the current regulatory requirements.

104-3 The potential positive economic impact of this activity in Delta County and the Western Slope is much needed as well as the additional energy resources to promote our nations energy independence, safety, and security. Thank you for the opportunity to comment on this project

Sincerely,
Craig J Meis, P.E.
826 21-1/2 Road
Grand Junction, CO 81505
970-263-7800 Office
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craigmeis@cordcomp.com

PAONIA RANGER DISTRICT
ACTION DATE
JUN 2 3 2003
DISTRICT RANGER_____
MINERIALS_____
LANDS/ENG_____
RANGE_____
WILDLIFE_____
GDA_____
DBM/DBM ASST_____
LEO_____
TIMBER_____

Letter 105

PAONIA RANGER DISTRICT
ACTION DATE
JUN 2 3 2003
DISTRICT RANGER
MINERIALS
LANDS/ENG
RANGE
WILDLIFE
GDA
GBM/DSM ASST
SO
FMSTA

"bill/cheryl day"
<bday@tds.net>
06/23/2003 10:24 AM
Please respond to
"bill/cheryl day"

To: <lmattson@fs.fed.us>
cc:
Subject: GEC EA comment

June 23, 2003

Project Manager, GEC Drilling Project
PO Box 1030
Paonia, CO 81428

Ms. Mattson,

105-1 Thanks for your work on the GEC EA, and the opportunity to comment on it. Because of the undressed potential for much more damaging drilling in the future, we oppose these eight wells and favor the no action alternative.

105-2 I do understand that this EA is only concerning the first eight exploratory wells, and that the impacts from them are not comparable to the potential impact from hundreds of wells later. I believe that any future analysis should include likely cumulative impacts from future full field development. Otherwise I fear that we will have numerous small projects , each with "no significant impact" on anything, that add up to extreme negative impacts to local residents and the forest. This is mentioned slightly-but pretty accurately- on page 3.6-20 under "Cumulative impacts".

Following are several comments on particular sections in the EA, most of which also apply to future projects:

105-3 1-1 The Thompson Creek well is to be directionally drilled because the lease is in an IRA. Because the GMUG is so heavily roaded, I think this is critical, and hope that no surface occupancy will occur on any lease in our few IRAs in any future project.

105-4 2-2 The section about onsite reviews changing proposed road locations was good. I hope these will always be rigorous in keeping the length of any new roads to a minimum, and avoiding old growth or other important habitat.

105-5 2-50 Issues not addressed-spacing. Although the BLM may usually do this, it seems like this should fit into the FS control of the surface. Without this we don't know if we are looking at 600 more wells in the future or 2400.

105-6 2-73 Noise levels will be below standards for nearest residents. There should be noise standards for the forest.

105-7 1-7 Five of these sites are in management area 4B (Wildlife). This should be more than enough reason to hold these wells to a high level of accountability regarding wildlife habitat. This should include the smallest amount of new roads possible, and the least amount of damage to old growth vegetation (especially aspen) possible, as well as preliminary breeding bird (purple martin and goshawk), TES, and MIS surveys.

105-8 1-5 One time exemptions. I don't know if there are good reasons for these or not.. If not, I don't favor breaking the rules every time the drillers ask for it, in case we end up with hundreds more well sites in the future.

105-9 3.6-1 I am pleased to see the discussion of habitat types. They all have different wildlife species associated with them. We cannot manage wildlife in the forest without being constantly aware of these different hab/veg types. In other words, it isn't good enough to take care of the tundra or spruce/fir but allow the aspen or oaks to be severely fragmented.

105-10 3.17-1 Discussion of the number acres lost to actual road beds or pads isn't meaningful. It would be much more meaningful to tell us the number of acres that are within ¼ and ½ mile of roads, before and after the project. The overall effects of fragmentation seem to be minimized in the EA. Once again, I realize that it isn't a huge impact from these eight wells, but

Letter 105 Continued

105-10 will be huge if we get a full field development.

105-11 3.6-23 Clarify or change the mention of aspen snags to include living old growth aspens with cavities, not just dead ones. There seems to be shortage of woodpecker holes and other cavities, and they are mostly in the larger older aspens. Otherwise, it is a very good idea.

105-12 3.6-3 This has a good description of Goshawk requirement for blocks of old growth forest habitats. There are several mentions of Goshawk and purple martin in the EA, and we agree that they are among the most at risk species from these activities. I have spent a lot of time on Grand Mesa studying purple martins, and am especially concerned about them. The proportion of the world's purple martins that live in natural tree cavities, that live on Grand Mesa is very high, so I feel like we have much of the responsibility for their survival here in the GMUG area. The discussion of them on page 3.7-18 is pretty good. I think even more emphasis should be put on simply not allowing new roads or pads in large, old growth aspens, in addition to the good strategies mentioned in this section. We should also remember that unlike most of the aspen's range, many areas of Grand Mesa have climax stands of large aspens, where they don't eventually give way to conifers, which makes the area unique.

105-13 3.6-3 This section also mentions the neotropical birds' use of various seral stages. This is probably true, but I want to add two other points to the discussion. First, in most habitats, we now have less old growth /late seral stage vegetation than these birds (and all other wildlife) have evolved with; and second, most birds that I know, including all obligate species for these habitats, require old growth. Trading old growth for more early seral/ edge habitat may help a small number of conspicuous species, but is damaging to most species.

105-14 All of the many other issues pertaining to this project that I might have mentioned are listed in sections 2.3 and 2.4. Unfortunately many of them -like many of the issues I have mentioned-are only slightly affected by each incremental increase in development on Grand Mesa. I hope that any future projects will require an EIS that estimates the total future impact of energy development on the National Forest and the local citizens.

Sincerely,

Bill Day
President,
Black Canyon Audubon Society
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Hotchkiss, CO 81419