

Comment Guidance for Fram/Whitewater Master Development Environmental Assessment

Right now, the BLM is accepting comments in a proposal to drill 108 oil wells right outside of Grand Junction and along the base of the Grand Mesa. This area is the primary watershed for the City of Grand Junction, providing pristine, fresh drinking water to over 60,000 people.

It is critical that this project be held to the highest standards possible, if it is allowed to happen at all. Please help us protect our most precious resource, our drinking water, and send a comment to the BLM today. **Comments are due August 28, 2017.**

You can submit comments to the BLM at: blm_co_si_mail@blm.gov

or via hardcopy at:

The Bureau of Land Management,
Attn: Whitewater MDP, 2300 River Frontage Road, Silt, CO 81652

Contact Emily Hornback at Western Colorado Congress for more information: 970-256-7650,
emily@wccongress.org

Topics for comments:

Water:

- The BLM must protect the Grand Junction watershed and respect the Watershed Protection Ordinance that was passed by the City Council in 2006.
- Currently, there are no pads proposed in the “hydraulic watershed,” however access roads are in the watershed area and will require improvement to be viable.
 - Road construction is known to have negative impacts on water quality due to sedimentation. Truck accidents on these roads could also spill contaminants into the watershed.
 - BLM must move all access roads out of the watershed area.
- The proposed pads and wells will impact the larger “area of influence” in the GJ watershed, including springs and irrigation ditches that local ranchers and landowners rely on for stock water.
 - BLM must fully protect these water sources, by either moving the pads completely out of the watershed impact area or requiring Fram to fully encase all bore holes with concrete to the bottom-hole locations.
- The EA is proposing to take all of the waste water from the project to the Deer Creek waste disposal pit in Whitewater, a facility that has been plagued with problems and odor issues, severely impacting the quality of life for nearby homeowners.

- BLM must come up with alternative solution for wastewater disposal that will not utilize the Deer Creek pit and risk more problems for residents.
- The operator's preferred fracking technique is estimated to use up to 44,371,800 barrels or, 1.8 billions gallons of fresh water to drill these wells. This is not an appropriate use of pristine, first use water that should be prioritized and saved for drinking water.
 - BLM must ask FRAM to find another water source that will not remove first use water from the hydraulic cycle nor take water from the Colorado River and negatively impact endangered fish species

Air Quality:

- Oil and gas development can contribute to air pollution by emitting volatile organic compounds and nitrogen oxides which combine with sunshine during the summer months, causing ozone. Although the area's *average, overall* ozone levels remain in the safe category, summertime levels have peaked dangerously high, putting sensitive populations, including children, at risk of asthma and other serious lung and heart health illnesses. Ozone also affects crops; which endanger our area's agricultural economy.
- During the winter months, the Grand Valley experiences days and weeks of cold air inversions, which trap pollutants in our air and result in high levels of PM2, particulates that are so tiny they are absorbed in the lungs and can cause respiratory illnesses. Particles of dust, known as PM10, also contribute to wintertime air pollution. Particulate sources vary from vehicle exhaust to construction activity as well as oil and gas operations.
- BLM must hold the operator to the highest air quality standards possible, which include consistent, accurate monitoring of the area. In addition, Colorado's Air Quality Emission Control Standards must be strictly enforced.

Traffic and Road Impacts

- Fram is proposing to use B Road in East Orchard Mesa as the northern trucking route, adding an estimated 260 vehicles to the road.
 - While this is better than using C road for the main route, it will still negatively impact residents and businesses on B Rd
 - Adding this number of trucks to a small residential road will increase the risk of accidents
- The BLM roads Fram proposes to use off B Rd are very undeveloped. Fram must ensure the long-term safety and feasibility of these roads, even beyond the life of the project. Or

they must be fully decommissioned. Taxpayers should not be left with the burden of maintaining the roads.

Recreational Impacts

- The area of proposed development exists within both the Horse Mountain and Grand Mesa Slopes, recognized by the BLM as special management areas for big game hunting, biking, camping, wildlife viewing, and quiet use recreation. BLM admits that the development will diminish and negatively impact these other uses of the area.
 - BLM must live up to its multiuse mandate and recognize that not all types of resource use are appropriate for every area of BLM land. Oil and gas development happens in almost all of the surrounding public lands. BLM should recognize the existing values in the Whitewater unit above that of oil development.
 - The proposed Palisade Plunge trail will look down on this area, and oil facilities and developed roads will detract from the views which are a major selling point of this outstanding trail.
 - Public land users will be harmed by the loss and “diminishment” of the recreational values of these lands.
- Oil and gas development in this area will also negatively impact the view shed of Grand Mesa, diminishing its scenic landscape value for both residents and tourists.

Wildlife

- The northern edge of the action area is recognized big game winter habitat. BLM admits that the proposed action will displace big game and probably impact outfitters in the area.
 - Again, BLM should value existing resources in the area over new oil development.
- There are many recognized threatened and endangered species in the area, including hookless cactus, raptors, and white-tailed prairie dog. BLM has taken some protective measures to account for these plants and animals, however has not sufficiently analyzed for impacts to the white-tailed prairie dog, which is a keystone species in the desert landscape.
 - BLM must re-analyze and offer more robust protections for white-tailed prairie dogs.

Pipelines:

- This project will also include a number of rural gather lines, which are currently in a regulatory grey area and thus dangerous.
 - BLM must address rural gathering lines in the EA and require a maintenance and inspection schedule for any rural gathering lines.

Financial

- Fram has been on shaky financial ground for a number of years. BLM and our local governments must ensure that taxpayers will not be left with maintenance and clean up bills if Fram defaults on some of its existing loans.
 - BLM must include language that will hold any future lease holders to these bonds
 - BLM must ensure stronger bonding requirements for Fram, or any future operators, for all aspects of the project, from well pad development to pipeline and road construction to reclamation costs.
- The BLM admits the area of the proposed action has had historical low oil and gas production, and is in fact a “low development potential” area. This EA is analyzing for an exploratory action that is speculative nature.
 - BLM should recognize that permitting speculative drilling operations in a low potential area is an inappropriate use of public land, tying the land up in one use for years and thus removing it from other uses. This is damaging to taxpayers and public land owners who would like to see that land prioritized for other values.

Other

- BLM is still operating on old data. The original scoping information for this EA was completed in 2011, over five years ago. Market prices, technology and conditions on the ground have changed in that period of time. Revised surveys and reports are not and adequate replacements for a full on environmental analysis based on quality information from the public.
 - BLM must re-analyze this document using more up to date information
- BLM has failed to provide an adequate range of alternatives for the public to comment on and compare.
 - Concerned members of the public would like to see an alternative that would keep Fram completely out of the hydraulic Grand Junction watershed and out of critical “areas of impact” to the Grand Junction watershed and local ranchers.
- Given these two points, BLM should re-analyze this proposed action with a full Environmental Impact Statement.

