Info Sheet: Bull Mountain Draft EIS

**General Info:** The Bureau of Land Management (BLM) is accepting public comments on a large-scale drilling proposal for the North Fork Valley watershed. The proposal is known as the Bull Mountain Master Development Plan (MDP). SG Interests submitted this MDP, which calls for 146 new gas wells, 4 new waste water disposal wells, and associated infrastructure in the Bull Mountain Unit—a nearly 20,000 acre area between Paonia Reservoir and McClure Pass. This area is primarily private surface ownership with a majority of public minerals. In accordance with federal law, the BLM has prepared a draft Environmental Impact Statement (EIS) to consider the consequences of approving the project.

The BLM’s EIS considers three alternatives from which it can choose: Alternative A – No Action, which is what would happen if the BLM chooses to disapprove the MDP. Alternative B – Proposed Action, which is what SG Interests has proposed to do. And Alternative C – Modified Action, which is very similar to Alternative B with some additional mitigation measures and restrictions. SG Interests is not required to submit a MDP to develop their mineral leases. The use of an MDP is preferable to piecemeal development, and thus piecemeal environmental analysis by the BLM. It is important to note that if the BLM selects Alternative A – No Action, that does not mean that development will not happen. Rather, development could be proposed through a piecemeal process. The use of an MDP is preferable to plan for the cumulative impacts of the development and to require additional mitigation measures and best management practices that will reduce impacts if development goes forward.

**How to submit your public comment:**

- Email to bullmtneis@blm.gov
- Mail to Bureau of Land Management, Uncompahgre Field Office, Attn: Gina Jones, 2465 South Townsend Ave., Montrose, CO 81401
- Fax to 970-240-5368

**Public comment deadline:** April 16, 2015

**Instructions for submitting public comments:** The most effective comments to the BLM are substantive and offer site-specific or detailed information. BLM notes: “Comments will be more helpful if they include suggested changes, sources, or methodologies, and reference to a section or page number. Comments containing only opinion or preferences will be considered and included as part of the decision-making process, although they will not receive a formal response from the BLM” (Bull Mountain Jan. 2015 Newsletter).
Before submitting written comments, be advised that your entire comment—including personally identifiable information (such as your address, phone number, and email address)—may be made publicly available at any time. You can request that your personally identifiable information be withheld from public review, but BLM does not guarantee that they will be able to do so.

**Suggested Requests of the BLM:**

- BLM failed to consider a conservation alternative within its scope of alternatives. BLM needs to consider a conservation-oriented alternative and additional mitigation measures, such as “phased development” that would control the timing, pace, and location of new development and require interim reclamation, enhanced 1,000-foot setbacks for new well locations from water bodies, increased air pollution controls (e.g. no-bleed and low-bleed pneumatic devices, green completions and closed-loop drilling systems),
- BLM should require increased financial assurance (i.e. bonding) of an amount adequate to cover cleanup and remediation of a catastrophic accident and to ensure complete reclamation at the project’s completion,
- BLM should require mandatory baseline surface water sampling and ongoing monitoring, collection of baseline air samples prior to development, and ongoing air monitoring to test for chemicals related to drilling and fracking operations, like methane, volatile organic compounds (VOCs), and polycyclic aromatic hydrocarbons (PAHs),
- BLM should require additional mitigation measures to prevent harm to big game animals—which would also harm the local hunting economy—such as timing limitation stipulations during certain seasons on operations and maintenance activities and big game monitoring throughout the life of the project,
- BLM failed to consider the social cost of carbon (SCC). BLM quantified the alleged economic benefits that this project would provide, but never gave equal consideration to the costs of such development, including costs to existing industries or analysis of SCC. Full analysis of SCC is essential to informed decision-making.

**Suggested Talking Points:**

- For the most part, the jobs from this project will go to those already employed by the oil and gas industry as contractors—not to locals. Any marginal economic benefit to the community isn’t worth the risk to our air, water, and health.
- The heavy truck traffic from this project will impact the entire North Fork Valley. There's only two access points to the area - over McClure Pass or Highways 92 and 133. All told, the project could result in 43,294 heavy truck trips for drilling, fracking, and production over the life of the project.
- The project will use an enormous amount of water, which is particularly concerning given recent drought. Unlike other applications, this water must be permanently removed from the hydrologic cycle because it is mixed with chemicals. BLM estimates that 353.6 million gallons of fresh water will be used over the life of the project.

**More information on the 146-well Bull Mountain drilling plan:**

  - Hard copies of the EIS are available at the Paonia Library (2 Third St.), The Hive in Paonia (130 Grand Ave.), the USFS Paonia Ranger District (North Rio Grande Ave.), and the BLM Uncompahgre Field Office (2465 S. Townsend Ave. in Montrose).