March 22, 2017

Bureau of Land Management
2300 River Frontage Road
Silt, CO 81652

Email: blm_co_si_mail@blm.gov

Attention: NFMMDP

RE: Comments: GE LLC, North Fork Mancos Master Development Plan (NFMMDP) DOI-BLM-
CO-N040-2017-050-EA

The referenced proposed plan encompasses part of eastern Delta and adjacent areas in Gunnison County that have incurred earlier oil and gas exploration and development with renewed and continued activity since 2009. Delta County throughout this later period of time has continually provided comments, when appropriate, during various agency approval processes and/or providing direct approvals for several oil and gas projects and wells in this area. Delta County’s following comments on the NFMMDP are submitted within that continued involvement and with reference to the concerns expressed during those earlier comments.

Delta County through its continued involvement acknowledges the sequence of permitting and regulatory requirements that have already been placed on the existing leases involved in this master plan. In addressing the County’s concerns about development in this area, the County also recognizes those earlier and currently effective conditions and stipulations of approval. It is noteworthy to list some of those prior permitting and regulatory processes as they also addressed many of the issues contained in the NFMMDP. Concerns, although spoke to in these earlier reviews, of Delta County that will be summarized and re-stated later in these comments.
- **Mineral Leases** (private and federal), any lease conditions and stipulations apply.  
- **Federal Unit Agreements**, all leases in the NFMMMDP area are within four federal units, three approved and one nearing approval. These unit agreements include many conditional requirements for activities within the NFMMDP and all required a public review process. The Delta County portion of the NFMMDP lies entirely within the approved Iron Point Federal Unit.  
- **Permits (federal, state, and local)** for specific existing wells, well sites, access, pipelines, access, support sites, and operations each progressed and were constructed through their own public in approval processes.

The following comments are submitted with the acknowledgement and general reliance on the in depth results of prior analysis of concerns the NFMMDP area. The Board of County Commissioners (BOCC) believe future development would continue to occur in the plan area on a well by well basis without an over reaching management plan and without efficiencies provided by such a plan.

**Project Phasing:**

The systematic development of the Mancos Shale formation as proposed in the NFMMDP provides for efficient use of drilling rigs and support equipment and personnel. Efficiencies that would reduce the physical impact of development otherwise occurring if developed in a well by well basis over a longer period of time. Delta Board of County Commissioners (BOCC) supports this controlled and planned approach to develop the Mancos Shale potential. The proposal also breaks the total development of the plan area into two phases. The first phase is presented for approval in this proposal and the second benefiting from the knowledge gained from the first phase would be presented for a similar full public review at a later date.

**Water:**

Protection of the quality and available quantity of water is always a concern for the County, particularly when construction and/or oil and gas development is conducted in any upstream watersheds of water sources draining into and used by Delta County residents. The BOCC recognizes the Operator’s Committed Measures noted in paragraph 4.10 of the application has addressed most of the key elements that provide protection of water through operation controls and initial baseline data and continued monitoring of water information. The BOCC requests the BLM specifically address this issue and review the adequacy of the proposed plan. Following an approved master development plan will help minimize the cumulative impacts of the proposed development on this very important resource.

**Off-site impacts to the County, Municipalities, roads, and traffic:**

The County is always concerned about the unknown cumulative offsite impacts caused by increased oil and gas development in or near the County. The support routes within the proposal do not involve Delta County roads, however, the County’s maintenance of Forest Service road 265 within Delta County under an agreement with the Forest Service could be affected by the proposed plan. The County would like for any decision on the (EA) to consider the County’s involvement in this support road. It is likely that Stevens Gulch Road (similarly maintained) may also be used at times in support of the NFMMMDP and would also be of concern for the County. The County requests the EA acknowledge
earlier considerations for addressing any impact of the project on these roads even if the ultimate use will be limited.

**Wildfire and Emergency Preparedness:**

The County emphasizes that although the Forest Service provides protective and suppressive measures for wildfires on Forest Service lands surrounding the project; it is in an area having private property where mutual support by County emergency and fire districts would be available, utilized, and expected. The Board stresses that all measures necessary to minimize wildfire hazards due to the proposed operations be imposed through the approval of the plan.

**Recreation and Tourism:**

The areas around the project on both Forest Service and Bureau of Land Management lands are key recreational areas on the eastern side of Grand Mesa served by the County and its Towns. The County would emphasize the need to provide continued minimal interruption and delays on Forest Service roads during development under the plan. Approaching the development through a master plan in conjunction with the existing operating conditions will continue to decrease any overall impact to these important elements of Delta County’s economy. Any negative impact on recreation or the impression of tourists using these roads are of major concern as that impact extends beyond the Unit boundaries and into the surrounding economy of Delta County.

**Air Quality, Soils, and Erosion:**

Although these issues have been addressed in the earlier processes or will be during any later specific well permitting approvals, the County would stress the need for adequate measures in the EA to curb any degradation to the soils and run off dispersion or dust related issues tied to operations during normal and heavy weather conditions.

**Socio-economics and Cultural Resources:**

While recognizing the socio-economic benefit of energy development to our Nation and communities, it is also understood that such development impacts other important economic sectors in communities, e.g. recreation and tourism, etc. All such impacts should be addressed.

**Interagency (BLM and COGCC):**

The County understands the Colorado Oil and Gas Conservation Commission (COGCC), will also process Applications for Permits to Drill (APD) for the wells proposed within this Unit. The County is not sure how the APD requirements under a master development plan, and/or BLM individual well permits with similar overlapping requirements in COGCC permits are jointly addressed.

**Comment on Recent activity in the NFMMDP area:**

Delta County has witnessed Gunnison Energy, LLC (GE LLC) recent activities within the NFMMDP boundary and surrounding area. The prudent and effective efforts by GE LLC and surface owners to thus far minimize and mitigate the impacts of the ongoing development are evident. Delta County would hope these earlier diligent efforts are recognized when reviewing the EA process for the NFMMDP.
Per CEQ guidelines, actions are connected if they:

(i) Automatically trigger other actions which may require environmental impact statements.

(ii) Cannot or will not proceed unless other actions are taken previously or simultaneously.

(iii) Are interdependent parts of larger action and depend on the larger action for their justification. (40 CFR 1508.25)"

This initial phase will not automatically trigger the second phase. Only after the first phase well shows economical production would a company proceed. This initial phase can proceed on its own merits. This initial phase is not part of a large action it is dependent on for its justification. The cumulative effects of the second and large phase could be evaluated more comprehensively and with the information and impacts of the first phase to use as a basis. The entire second phase could be eliminated or significantly changed by the results of the first phase. For the most part sedimentary geology complicated by the stresses of tectonics, igneous intrusives along with difficult surface terrain all complicate the predictability of success without some systematic initial evaluations.

In closing, the BOCC appreciates the opportunity to comment on the proposed NFMMDP. The BOCC supports any master development plan that provides prior understanding of continuing oil and gas activities over well by well development that will inevitably continue to occur in this area. The BOCC emphasizes the recognition of existing conditions and stipulations when considering offsite impacts and the necessity for additional mitigation of any potential accumulative negative effects from development of this size. The earlier conditions and mitigation measures have been important to those who have adjacent property or depend on and use the resources originating on the surrounding area and Grand Mesa.

Sincerely,

Delta Board of County Commissioners

C. Douglas Atchley, Chairman
J. Mark Röeber, Vice Chairman
Don Suppes, Commissioner