Gunnison Energy’s North Fork Mancos Master Development Plan (NFMMMDP) is BACK. In 2017, the company proposed to drill, frack, and operate up to **35 new wells** in the Upper North Fork watershed about 12 miles northeast of Paonia. The project was on hold for much of last year as the company tested possible fracking methods, and they have chosen to proceed with a much more water-intensive process than was originally proposed.

**The Project - Background:**
- 34,906-acre project on mostly public lands.
- 35 new wells from 4 new well pads and one existing pad.
- Adjacent to the recently approved 146-well Bull Mountain MDP.
- The project would be developed over 4 years.

**The Project - New Information**
- The updated proposal would use 67.3-acre feet (or nearly 22,000,000 gallons) of water for each well.
- The total estimated water use for the entire project is 2,355.5-acre feet. (or roughly 768,000,000 gallons).
- Water would come from a variety of sources:
  - Fresh water from the Muddy Creek/West Muddy Creek when available,
  - The Elk Creek Mine’s water right,
  - The City of Delta,
  - Recycled/produced water from other oil and gas operations, including Coal Bed Methane (CBM) wells.
- The new fracking method would also require a significant amount of sand to prop up the newly formed fractures.

**Issues:**
- The amount of water for the project is roughly equal to 20% of the capacity of the Paonia Reservoir. The water system in the North Fork Valley is already highly stressed. Withdrawing that much water is incompatible with the other, existing uses in the area.
- Delivering so much water to the project area would require a significant increase in truck traffic from Delta to Somerset.
- The project would require hauling sand in trucks from Fruita (about 50 round trips per day over 50-60 days) from the Elk Creek Mine to the well pads.
- The NFMMMDP is adjacent to the 146-Well Bull Mountain Master Development Plan
- East Muddy Creek, West Muddy Creek, Hubbard Creek-North Fork Gunnison River Watersheds, which feed some of the North Fork Valley’s most important irrigation and drinking water sources, are at risk.
- The project is proposed in one of the most geologically unstable regions in the State, which witnessed the largest mudslide in the country, and Hwy 133 has regular problems with rockfalls.
- There are already injection wells in the area that may be correlated with recent earthquakes near Carbondale (2.8 magnitude on January 19th, 2017 28 km S of Carbondale; 1.6 magnitude on January 19th 26 km S of Carbondale) and Paonia (3.5 magnitude on July 23, 2016 7 km NE of Paonia).
Wildlife and Game Management Unit 521 is at risk. This area is part of a popular, heavily used, and highly prized hunting area, and includes critical habitat for Colorado’s elk and deer herds.

Rural gas gathering pipelines are exempt from federal pipeline safety regulations.

This project is the first phase of a potential 104-well, 13-pad development by GELLC within the NFMMDP project area, for which detailed planning and analysis are currently unavailable.

BLM and the US Forest Service are seeking comments from the public to identify concerns and issues before they begin drafting the environmental assessment analyzing the proposal. The comment deadline is now April 1, 2019.

Send comments to the BLM and USFS:

- Stating that this application is incomplete until the operator can demonstrate a source for all the water to be used in this project, and conducting an EA without that information is premature and invalid.
- Requesting that no new development until federal resource management planning is revised to properly protect the resources of the North Fork Valley. Any new development during the resource planning revision process now underway for the Uncompahgre Field Office Planning Area and the USFS’ Grand Mesa, Uncompahgre, and Gunnison National Forests, prejudices the cumulative impacts analysis required by the National Environmental Policy Act.
- Requesting a full Environmental Impact Statement instead of the currently proposed Environmental Assessment. The proposed project is complex, impacts 3 critical watersheds of the North Fork Valley, is proposed in one of the most geologically unstable areas in the State and with recent earthquake activity that may be related to existing injection wells, and is adjacent to the 146-Well Bull Mountain Master Development Plan, which was also subject to a full Environmental Impact Assessment. This alone merits a full Environmental Impact Assessment.

You can send your comments to:

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