

WESTERN SLOPE CONSERVATION CENTER

North Fork Mancos Master Development Plan Revised Environmental Assessment – March 2019 *Comments Due April 1, 2019*

The BLM and USFS are requesting comments on Gunnison Energy's updated North Fork Mancos Master Development Plan (NFMMDP) on ~35,000 acres of mostly public land in the headwaters of the North Fork of the Gunnison. The NFMMDP, which was submitted in 2017, originally stated that Gunnison Energy (GELLC) would use a nitrogen foam material to hydraulically fracture their 35 wells. GE now plans to use the more common and water-intensive "slickwater" to hydraulically frack (HF) the wells. The new development plan will drastically increase water consumption. According to the proposal, GELLC will drill 35 new wells from 3 new wells pads, 1 expanded existing pad, and 1 existing pad. Development would occur over 4-6 years, depending on water sources and storage capacity

WHAT SHOULD I COMMENT ON?

INCREASED WATER USE

-The original project with nitrogen foam fracking method planned to use 5.8 acre-feet, or 1.8 million gallons, of water per well. With the revised slickwater method, GELLC plans to use **67.3 acre-feet per well, or nearly 22 million gallons per well.**

-Approximately *83% of the total water would be first-use fresh water from surface sources*, based on the limited amount of produced water available for treatment and re-use. Annual use of fresh water associated with five wells in the first year and six wells in the second year would be approximately **278.7 acre-feet and 334.5 acre-feet**, respectively.

-Total water use throughout the life of the project could be upwards of **770 million gallons of water.**

INCREASED TRUCK TRAFFIC

-To meet the current estimates of fresh water needed for the first 2 years of development, existing sources of water would be supplemented by trucking **34.0 acre-feet of municipal water** (about 10% of the total) from **the City of Delta** along a short segment of US 50 and then on State Highway (SH) 92 and SH 133 to a turnoff north of Paonia reservoir. Trucking of water would occur on **50 to 60 days of late summer and fall**, and would result in **~42 roundtrips per day across 24 hours on haul-days.**

-In addition to water haulage from the City of Delta, GELLC proposes to truck sand from the Elk Creek Mine. The sand would be used as a proppant to help keep fractures in the target formation open to facilitate gas recovery. Truck haulage of sand, proposed to occur on **50 to 60 days per year in late summer and fall**, would result in **47 roundtrips per day on haul-days.**

-Total increase in truck traffic of **89 round trips per day** during drilling operations.

ASK FOR A MORE THOROUGH REVIEW WITH AN ENVIRONMENTAL IMPACT STATEMENT

-The size and scope of this project – especially considering the increased water use - merits an Environmental Impact Statement (EIS), which will provide more thorough analysis of possible impacts, rather than an Environmental Assessment (EA).

-Additionally, this project should be considered along with other existing and planning development in the area, which includes the 146-well Bull Mountain Master Development Plan and the 25-well Somerset project. Ask the BLM/USFS to conduct a full Environmental Impact Assessment to consider the cumulative impacts of these projects on our watershed.

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HOW DO I COMMENT?

The proposal and preliminary environmental assessment can be viewed online at <https://go.usa.gov/xQBaq>. For comments to be considered, submissions must be received by April 1, 2019, via mail to the BLM Colorado River Valley Field Office, 2300 River Frontage Road, Silt, CO 81652, via email to comments-rocky-mountain-gmug@fs.fed.us or online at <https://go.usa.gov/xQBaq>.

WATER USE TABLES FROM THE REVISED ENVIRONMENTAL ASSESSMENT

Table 2. Revised Annual Per-Well Water Use

<i>Project Activity</i>	<i>Volume per Well (barrels)¹ (Tributary/Non-tributary)</i>	<i>Volume per Well (acre-feet)² (Tributary/Non-tributary)</i>
Drilling	3,000 / 0	0.4 / 0
Completion	410,000 / 90,000	52.8 / 11.6
Dust Control	19,520 / 0 ³	2.5 / 0
Total	432,520 / 90,000	55.7 / 11.6
¹ 1 barrel = 42 gallons. ² 1 acre-foot = 7,758.4 barrels. ³ Assumes 20% of the annual water usage for dust control based on 5 wells drilled per year.		

Table 3. Estimated Annual Water Use by Water Source and Category

<i>Water Source</i>	<i>Year 1 (5 wells)¹</i>	<i>Year 2 (6 wells)¹</i>	<i>Years 3 and 4 (12 wells each)^{1, 2}</i>
First-Use Tributary Water³			
Hotchkiss Water Storage Facility ⁴	798,600 barrels 102.9 acre-feet	1,231,120 barrels 158.7 acre-feet	1,231,120 barrels 158.7 acre-feet
Elk Creek Mine Water Right Facility	1,100,000 barrels 141.8 acre-feet	1,100,000 barrels 141.8 acre-feet	1,100,000 barrels 141.8 acre-feet
City of Delta	264,000 barrels 34.0 acre-feet	264,000 barrels 34.0 acre-feet	0
Subtotal	2,162,600 barrels 278.7 acre-feet	2,595,120 barrels 334.5 acre-feet	2,331,120 barrels 300.5 acre-feet
Recycled or Non-Tributary Water³			
Coalbed Methane Wells ⁵	450,000 barrels 58.0 acre-feet	540,000 barrels 69.6 acre-feet	1,080,000 barrels 139.2 acre-feet
Currently Unsecured Additional Sources	--	--	2,859,120 barrels 368.5 acre-feet
Subtotal	450,000 barrels 58.0 acre-feet	540,000 barrels 69.6 acre-feet	3,939,120 barrels 507.7 acre-feet
¹ 1 barrel = 42 gallons; 1 acre-foot = 7,758.4 barrels. ² Dependent on GELLC's ability to secure sufficient additional sources and storage facilities for recycled produced water or non-tributary water. See COA #3, Appendix B . ³ Tributary = Contributes to streamflow (in the Gunnison River Subbasin); Non-tributary = Does not contribute to streamflow (in the Gunnison River Subbasin). ⁴ Includes recycled produced water and water from Muddy Creek/West Muddy Creek when available; the State Water Commissioner controls the timing and amount of withdrawals. ⁵ Obtained from GELLC's Coalbed Methane Wells (not tributary to the Gunnison River Subbasin).			