

Ms. Katie Stevens, Field Office Manager  
Ms. Julia Christiansen, Natural Resource Specialist  
Bureau of Land Management  
Grand Junction Field Office  
2815 H Road  
Grand Junction, CO 81506  
[BLM\\_CO\\_GJ\\_Public\\_Comments@blm.gov](mailto:BLM_CO_GJ_Public_Comments@blm.gov)

Re: Fram Whitewater Master Development Plan (DOI-BLM-CO-130-2012-0003-EA)

Dear Ms. Stevens and Ms. Christiansen:

I write today to share my concerns about the Bureau of Land Management's (BLM) draft Environmental Assessment (EA) for Fram's Whitewater Unit Master Development Plan (MDP), identified as DOI-BLM-CO-130-2012-0003-EA. The proposal calls for development of up to 108 wells on 12 new well pads across a 26,000-acre project area, producing an estimated 8.7 million barrels of oil over the 20-year life of the project. I am deeply concerned about the impact to the environment and human health that may result from approving this project.

***Please personalize your letter. Why are clean air and clean water important to you and to the Western Slope of Colorado? What other resources (recreation, wildlife, traffic, methane waste, etc.) are a concern to you in this proposal?***

Given the documented evidence of water and air pollution from drilling and fracking, I ask that the BLM prepare an Environmental Impact Statement (EIS) for Fram's Whitewater MDP. An EIS is required because the approval of this proposal may have a significant effect on the environment.

Only through the kind of analysis conducted in an EIS can the BLM ascertain the impacts that could result to air quality from this proposal. Our air is already at risk: during the first quarter of this year, 75% of air pollution enforcement cases in Colorado were related to oil and gas; and during last winter, parts of Western Colorado experienced ozone levels above the federal standard. The BLM should require a mandatory baseline air sampling program with continued monitoring to determine if the operator is impacting the already vulnerable air quality in the area. Baseline water sampling and ongoing monitoring should also be required for both surface and ground water.

The BLM should also require adequate financial assurance (also known as bonding) in order to clean up potential accidents and to fully reclaim the impacted areas after drilling and production are complete. The draft EA only contains two references to financial assurance, during the discussion of issues raised in the scoping comment period. The EA contains no discussion of requiring adequate financial assurance. The recent report, "Who Pays the Costs of Fracking?", from Environment Colorado, recommends that drilling companies "post financial assurance of at least \$250,000 per well for the cost of plugging and reclamation and at least \$5 million per well

for damage to private property, health and natural resources, as well as environmental cleanup.” BLM needs to require adequate bonding before approving a project of such a large scale.

Furthermore, approval of the Whitewater MDP is not warranted before the revised Resource Management Plan (RMP) is completed for the Grand Junction Field Office (GJFO). The previous RMP, which currently governs land use in the GJFO, was completed in 1985 and is inadequate to “tier” from in order to approve the Whitewater MDP. The existing RMP from the 1980’s could not anticipate the current practice of oil and gas development, and therefore does not sufficiently analyze potential impacts to the environment.

Based on the lack of an EIS and lack of adequate stipulations needed to protect the environment, I believe that the BLM must select the “No Action” alternative until such time as the GJFO has prepared an EIS for the Whitewater MDP and the agency has updated its RMP for the area.

Sincerely,

*Name*

*Address*

*City, ST Zip*