



## State of Utah

JON M. HUNTSMAN, JR.  
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## Office of the Governor

PUBLIC LANDS POLICY COORDINATION

LYNN H. STEVENS  
*Public Lands Policy Coordinator*

RESOURCE DEVELOPMENT COORDINATING COMMITTEE  
*Public Lands Section*

November 20, 2006

Stephanie Howard  
Bureau of Land management  
170 South 500 East  
Vernal, Utah 84078

SUBJECT: Enduring Resource's Rock House EA  
Project No. 06-7213

Dear Ms. Howard:

The Resource Development Coordinating Committee (RDCC) has reviewed this proposal. State agencies comment as follows:

### **Department of Environmental Quality/Division of Air Quality**

On p. 1 of the Interdisciplinary Team Checklist, the Environmental Assessment (EA) states that compressors are not proposed and that air quality impacts from dust are expected to be negligible. However, the document does not identify the air quality of the region, or the impact from emissions produced by the gas development mentioned.

The development of 55 natural gas wells, which includes the clearing of land for associated roads, the installation of miles of pipelines, and the construction of well pads, has the potential to produce significant emissions.

The Uinta Basin, which includes large portions of Duchesne and Uintah Counties, is currently in an "unclassifiable/attainment" status for all National Ambient Air Quality Standards (NAAQS). However, recent emission inventories for Duchesne and Uintah Counties have identified that significant quantities of volatile organic compounds (VOC), oxides of nitrogen (NOx), and particulate matter (PM) are produced by or are present during the construction, drilling, production, and capping phases of oil and gas exploration.

We look forward to working with the BLM, as we have with the operators and local officials in the past, to identify these environmental issues, and the air quality of the region in



general, in the EA.

We recommend that your office supplement and/or revise the EA by addressing these air quality concerns.

### **Department of Environmental Quality/Division of Water Quality**

Well must be sited, drilled, and managed to prevent degradation of water quality through measures to limit erosion, control stormwater runoff, and limit pollutant loading to adjacent streams, dry washes, or ground water. BMPs should be implemented for access roads, ROWs, and any other direct or secondary disturbances resulting from the project.

1. Wellpad placement or expansion disturbs soils. Vegetative and/or structural measures to control erosion should be implemented within 60 days of initial soil disturbance to prevent erosion leaving the site from exceeding the tolerable rate as determined by the local office of USDA/NRCS. Such erosion control shall be maintained for the duration of the lease and shall remain in functional operation when the lease or permit is terminated.
2. If vegetation surrounding the wellpad does not provide at least 60% ground cover within 60 days of creating the wellpad, engineering practices should be implemented within those 60 days to control erosion. Such engineering measures may include mulching, use of fiber mats, cross slope trenching, contour furrows, rock dams, terracing or such other erosion control practices as are required to prevent erosion from exceeding the tolerable rate.
3. No disturbance or degradation to or of surrounding or nearby soils, native or beneficial vegetation, or riparian areas should be permitted outside of the area defined in the permit.
4. No spills nor runoff of chemicals including hydrocarbons, lubricants, salt water, antifreeze, or other potentially damaging materials should be permitted.
5. Before wellpad use is discontinued, permit holder shall restore the site to prevent stormwater runoff from exceeding water quality standards.

The following permits from our Division are required during the construction phase of the project:

Construction activities that grade one acre or more per common plan are required to obtain coverage under the Utah Pollutant Discharge Elimination System (UPDES) Storm Water General Permit for Construction Activities, Permit No. UTR100000. The permit requires the development of a storm water pollution prevention plan to be implemented and updated from the commencement of any grading activities at the site until final stabilization of the project. A fact sheet describing the permit requirements and application procedures is located on our web site



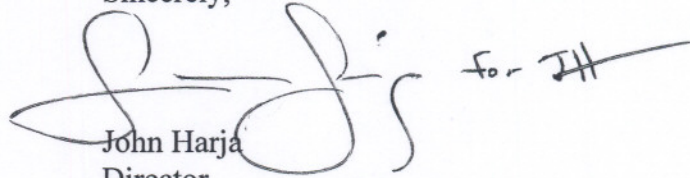
[waterquality.utah.gov](http://waterquality.utah.gov).

Dewatering activities during the construction may require coverage under the UPDES General Permit for Construction Dewatering, Permit No. UTG070000. The permit requires water quality monitoring every two weeks to ensure that the pumped water is meeting permit effluent limitations.

In addition to these permitting requirements, the Division of Water Quality requires the submission of plan elements for permanent storm water runoff control and treatment during long term operation of the facility operates, as applicable.

The Committee appreciates the opportunity to review this proposal. Please direct any other written questions regarding this correspondence to the Resource Development Coordinating Committee, Public Lands Section, at the above address or call Jonathan G. Jemming at (801) 537-9023 or Carolyn Wright at (801) 537-9230.

Sincerely,

A handwritten signature in black ink, appearing to read "John Harja" followed by a flourish and the initials "for JH".

John Harja  
Director

Resource Development Coordinating Committee  
Public Lands Section