

Rick Schuler Comments.txt

From: Michele_Easley@blm.gov
Sent: Tuesday, November 27, 2007 3:27 PM
To: Jon Kehmeier
Subject: Fw: Moxa Comments

Michele Easley
Planning and Environmental Coordinator
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----- Forwarded by Michele Easley/KFO/WY/BLM/DOI on 11/27/2007 03:26 PM

Rick
Schuler/WYSO/WY/B
LM/DOI

11/21/2007 11:23
AM

Michele_Easley/KFO/WY/BLM/DOI@BLM To
cc

Dennis
Doncaster/RSFO/WY/BLM/DOI@BLM, Paul
Summers, Mary Jo
Rugwell/KFO/WY/BLM/DOI@BLM, Marty
Griffith/WYSO/WY/BLM/DOI@BLM, Bill
Daniels/WYSO/WY/BLM/DOI@BLM,
kpeacock@bresnan.net

Subject

Fw: Moxa Comments

I concur with and would like to emphasize Dennis's comments. Surface and groundwater issues have gained considerable scrutiny in the Upper Colorado River Basin due to several factors:

- 1) quantity related concerns - e.g., groundwater issues associated with drawdowns and impacts to existing wells and water rights; also, use of groundwater by O&G development and possible depletion issues associated with groundwater connectivity to surface flows in the Colorado River;
- 2) quality related concerns - e.g., benzene and hydrocarbons contamination of O&G water supply wells and aquifer(s); increased erosion, runoff, sedimentation, and salt loading in the Colorado River due to surface disturbance associated with O&G development.

These concerns are voiced by the State, Colorado River Salinity Control Forum, and EPA. This level of attention began in the Upper Basin with the Jonah II infill project. The use of predictive modeling to assess effects of O&G based surface disturbance began with the use of AGWA (Automated Geospatial

Watershed Assessment) in the Jonah II project (Dennis sent you a copy of the report). In conclusion, we set a precedent in using AGWA in assessing disturbance impacts in response to concerns from the Forum and EPA ... both were satisfied with the AGWA analysis. The Jonah II and S. Piney reports can serve as a guide to a similar effort on the Moxa project, but, we have learned from those earlier efforts so we can tailor the AGWA approach for Moxa (better input parameters and use of site specific data, bracketed input parameters to characterize best and worst case impacts, etc.) To this end, an AGWA model preparation guide is being prepared by Dr. Scott Miller as part of a coop BLM/University project to adapt AGWA for routine use

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in assessing surface disturbance effects for all BLM permitted projects (O&G in particular). This should be available within 2-3 wks. I am also including

a web address for the new AGWA site.

I recommend you review the reports from Dennis, the guide (when provided), and the AGWA website in the next 1-2 wks and then we conference call (you, your hydrologist/modeler, myself and Dennis) to strategize how the project can

incorporate the AGWA analysis modeling. I will try to catch you by phone soon

to chat about this email info, or call me at 6092.

thanks much Rick

check this site ----- <http://www.tucson.ars.ag.gov/agwa/>

----- Forwarded by Rick Schuler/WYSO/WY/BLM/DOI on 11/21/2007 09:51 AM

Dennis
Doncaster/RSFO/WY
/BLM/DOI

11/19/2007 04:48
PM

To
Michelle Easley/KFO/WY/BLM/DOI@BLM
cc
Rick Schuler/WYSO/WY/BLM/DOI@BLM,
Paul Summers/NOC/BLM/DOI@BLM
Subject
Moxa Comments

Michelle,
I will be adding more comments to this but there are some things that could be

started on now so I am sending it to you before the closing comment date Paul,

Rick, We were discussing this earlier and I thought you might be interested in

looking at what I have found so far.

[attachment "Moxa Draft Comments 1.doc" deleted by Rick Schuler/WYSO/WY/BLM/DOI]

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