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Category: Mineral Resources

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Comment:

Coalbed Methane

The Affected Environment section of the Draft EIS fails to disclose and analyze groundwater quality for coalbed methane targets in the Fort Union or other coal-bearing formations. See DEIS at 3-14. Detailed information should be easy to gather and analyze from past CBM and/or conventional oil/gas wells and/or water wells producing water from these formations. BLM should disclose the range and distribution of groundwater pollutants including salts, ions, heavy metals, and other constituents with the potential to affect surface water quality if CBM wastewater is to be released at the surface. BLM's failure to disclose groundwater quality levels from potential CBM target strata is an important failure of NEPA's requirement to gather and disclose baseline information.

Directional Drilling

There are a number of inaccuracies and incomplete analyses contained in the Draft EIS regarding directional drilling, which are used by BLM as rationales for eliminating directional drilling as a required practice. This entire section has been drafted without citation to published studies or authorities, which makes it difficult to judge the relative merit of assertions contained therein. The DEIS states at 2-5, directional drilling requires precise control of target locations in three dimensions. While this may be true for horizontal wells, other types of directional drilling (e.g., s-turn wells) are not subject to this limitation and perform like vertical wells with regard to penetrating pay zones of varying thicknesses.

BLM also states that borehole collapse is likely in directional wells during fracture stimulation, an assertion that appears to be based on incomplete analysis. This may be true for open-hole completions, however, many directional wells are completed using liners. What is the difference between borehole collapse in lined versus unlined boreholes? Can the BLM demonstrate a performance difference between directional and vertical wells when both have casings? We have significant doubts as to whether such a difference exists. In addition, the risk of borehole collapse should theoretically be identical in the vertical member of S-turn wells (which is where fracking occurs) as with vertical wells fracked in the same formation. If the BLM has any evidence that an S-turn well has a greater chance of borehole collapse than a vertical well in the same formation, the agency should produce it in the EIS; we have seen no such evidence in our review of the applicable petroleum engineering/geology literature.

BLM also blindly asserts that directional drilling could result in wells not drilled, and consequently reserves not recovered. See DEIS at 2-6. This is a speculative assertion at best. As oil and gas prices continue to rise with the continued depletions of these resources, wells uneconomic today will be drilled (and their resources recovered) in the future. At this point, the resources will be even more valuable economically and to the nation's energy picture than they are at present.