

Background

The San Juan Public Lands Center (SJPLC) is currently developing a revised land management plan for the San Juan National Forest (SJNF) and for Bureau of Land Management (BLM) public lands under the SJPLC's jurisdiction. In December 2007, the SJPLC released a Draft Land Management Plan ([Draft LMP](#)) and Draft Environmental Impact Statement ([Draft EIS](#)) for public review and comment. The four land management alternatives and oil and gas leasing alternatives considered in the Draft LMP/EIS were developed based on input from the public, BLM and U.S. Forest Service (USFS) personnel, other Federal, State, and local governmental agencies, Native American tribal agencies, and other groups and organizations.

During the 120-day public comment period (December 14, 2007 through April 11, 2008) for the Draft LMP/EIS, we received comments suggesting that our Reasonable Foreseeable Development (RFD) scenario for oil and gas development projections in the Paradox Basin was low because we did not consider the development potential of gothic shale gas, a potential new gas development play underlying portions of Montezuma, Dolores, and San Miguel counties. These comments and supporting documentation indicated that the following conditions used in our oil and gas leasing and development analysis had changed:

- geologic source potential: the emergence of a Gothic Shale Gas Play (GSGP) area in southwestern Colorado identified as having high resource potential;
- development technology: the advancement of horizontal drilling and hydraulic fracturing which makes extraction of gas from shale formations possible and more economical; and
- demand and activity: there has been significant leasing interest from industry on federal mineral estate within the GSGP area since the release of the Draft EIS and increased permitting activity on non-federal mineral estate lands within the GSGP area.

We also received comments on the Draft LMP/EIS suggesting that the type of air quality model we used was inappropriate for the scale of the plan and that we had exceeded the capabilities of the model as used in the Draft EIS. We considered all of this information, and through further technical evaluation, we determined that, 1) the GSGP was a high potential play that should be evaluated; and 2) a more detailed air quality model and analysis was needed to adequately represent potential air quality impacts in the planning area and disclose results specific to the new development projections for the GSGP area. We also determined that a Supplement to the Draft EIS was needed in order to incorporate this new information and analysis into the Draft LMP/EIS.

Supplement to the Draft EIS

Council of Environmental Quality regulations were developed to provide a framework for implementation of the National Environmental Policy Act (NEPA), and describe the need for “supplementing” environmental impact statements:

Agencies shall prepare supplements to either draft or final environmental impact statements if there are significant new circumstances or information relevant to environmental concerns and bearing on the proposed action or its impacts. [40 CFR 1502.9(c)(1)(ii)]

Consistent with NEPA, this Supplement to the Draft EIS is needed to present new analysis of the potential development of the GSGP and to disclose the new air quality model results. All information contained in the Draft EIS remains unchanged and is not repeated herein unless necessary to establish further context for meaningful review.

Purpose and Need

Because the Supplement is only adding information, it does not change the original Purpose and Need for the Draft LMP/EIS. As stated in the Draft EIS, the purpose of the San Juan Plan Revision is to update the USFS and BLM land management direction in one joint plan. A new plan is needed because social, environmental, and administrative conditions have changed significantly since BLM's San Juan/San Miguel Resource Management Plan (1985) and the San Juan National Forest Land Management Plan (1983) were developed. The purpose of revising the plans is also to address new public land issues and concerns that have risen over the years, and utilize new resource assessments and scientific information to update management direction.

All information in [Chapter One](#) of the Draft EIS, including the description of the purpose and need for the action, the scoping process and issues, planning criteria, the planning process, and all chapter sections related to the oil and gas leasing availability decision are unchanged by this Supplement. As stated in the Draft EIS on page 1.1, the analysis supports three related, but separate decisions:

- Adopting a revised Land Management Plan for the BLM lands managed by the SJPLC, excluding those contained in the Canyons of the Ancients National Monument (the Responsible Official for this decision is the BLM Colorado State Director);
- Adopting a revised Land Management Plan for the SJNF (the Responsible Official for this decision is the USFS Region 2 Regional Forester); and
- Determining the National Forest System (NFS) lands that will be administratively available for oil and gas leasing, as well as the associated stipulations (the Responsible Official for this decision is the San Juan Forest Supervisor). A similar decision for BLM-administered lands is made as part of the land management plan. Oil and gas leasing is analyzed together for both agencies in this Draft EIS; however, for the USFS, oil and gas leasing availability is considered as a programmatic decision and is separate from the decisions in a land management plan.

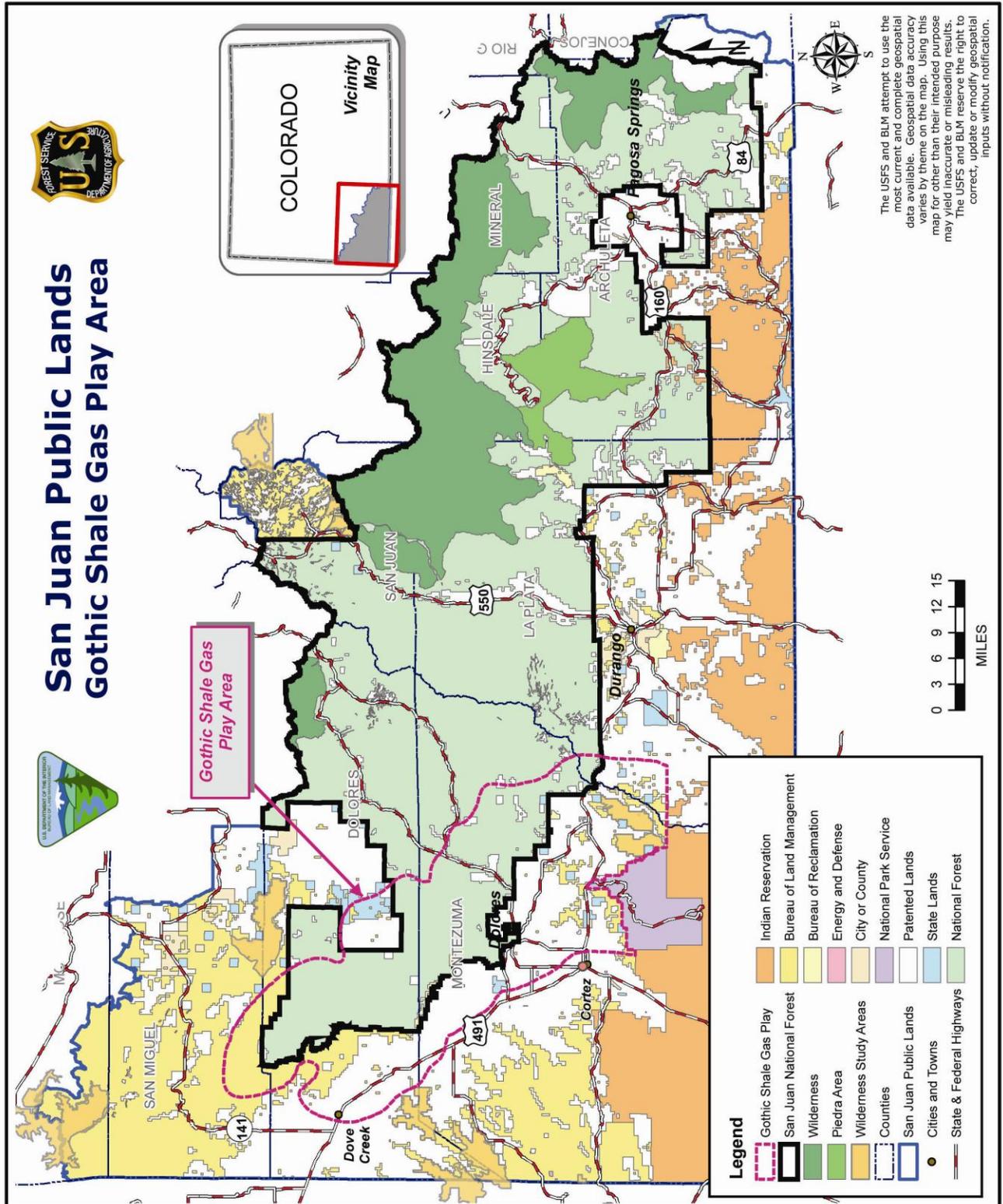
Description of the GSGP Area

The GSGP area comprises 646,403 acres located within Montezuma, Dolores and San Miguel counties and includes a mix of private, state, and public lands (see Figure S-1.1). BLM and USFS lands comprise 55% of the surface lands of the GSGP area (see Table S-1.1).

Table S-1.1 Surface Ownership in the Gothic Shale Gas Play (GSGP) Area

| Surface Ownership | GSGP Area (acres) | % of GSGP Area |
|---|-------------------|----------------|
| Federal Surface Lands | 354,800 | 55% |
| USFS | 252,320 | 71% |
| BLM | 102,480 | 29% |
| Nonfederal Surface Lands | 291,603 | 45% |
| TOTAL FEDERAL & NONFEDERAL SURFACE | 646,403 | 100% |

Figure S-1.1 Gothic Shale Gas Play Area



Public Comments

This Supplement does not attempt to directly address or answer any comments received on the Draft LMP/EIS. Comments received on the Draft LMP/EIS, plus the comments we receive on this Supplement will comprise the complete set of comments considered in developing the Final LMP/EIS. As you review this document, please direct your comments to the information presented.

Overview of New Information

A summary of new information presented in the Supplement and in supporting documents is provided below, with references to where this information can be found in further detail throughout the document.

New Information in the Supplement

- Development projections for the number of wells and associated acres of disturbance from well pads, roads, and related infrastructure has increased and is presented in Chapter Two.
- Assumptions regarding how the GSGP could develop, including acres of disturbance, water consumed to develop wells, disposal of waste water and cuttings, and other operational considerations have been added to the introduction of Chapter Three.
- The GSGP occurrence potential has been added to the Affected Environment of Section 3.15 - Minerals and Energy: Fluid Minerals.
- Current monitoring data has been added to better describe the existing conditions in the Affected Environment of Section 3.1 - Air Quality.
- New standards and guidelines for air quality and water are listed in Chapter Two.
- The impact analysis associated with the development of the GSGP area is organized by resource in Chapter Three “Affected Environment and Environmental Consequences”. All information presented in Chapter Three of this document supplements the impacts disclosed in Chapter Three of the Draft EIS.

Updated Supporting Documents

The RFD Scenario and the Air Quality Technical Support Document (TSD) are supporting documents that provide the foundation for the assumptions and analysis in this Supplement. These documents are available for review online at <http://ocs.fortlewis.edu/forestplan> or by requesting a copy from the SJPLC.

- **2009 ADDENDUM to the Oil and Gas Potential and Reasonable Foreseeable Development (RFD) Scenarios in the San Juan National Forest and BLM Public Lands, Colorado:** The 2006 reasonably foreseeable development scenario addresses projected oil and gas development within the general planning area, both on public and private mineral estate. The 2009 addendum addresses the development projections of the GSGP and includes projected number of wells and associated surface disturbance estimates in addition to other supporting information related to favorable geology. Development projections for the GSGP approximately double the number of wells that were originally projected for the entire planning area. The 2006 RFD projected 1,185 wells, and the 2009 RFD Addendum identifies an additional 1,769 wells for the GSGP area (2009 RFD Addendum, page 38). The 2009 Addendum also includes an updated map of Hydrocarbon Occurrence Potential, which now identifies the GSGP area as a “high” potential area.

- **Air Quality Analysis Technical Support Document:** This document outlines the modeling protocol and the detailed air quality model results which were completed in 2010.

