

FOREST VIEW ACRES WATER DISTRICT

c/o Community Resource Services of Colorado, LLC
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Greenwood Village, CO 80111
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June 18, 2013

PSICC Oil and Gas Scoping Comments
PSICC Supervisor's Office
2840 Kachina Drive
Pueblo, CO 81008

Attn: John Dow, PSICC Forest Planner

Re: Forest View Acres Water District Comments for Oil and Gas Leasing in Pike National Forest

Dear Mr. Dow:

Forest View Acres Water District (FVAWD) is submitting comments to aid development of the Forest Service's Environmental Impact Statement (EIS) for Oil and Gas Leasing within the Pike National Forest.

Forest View Acres Water District's Interest.

FVAWD is a Special District under Colorado Title 32 and is located in northwestern El Paso County immediately adjacent to the Pike National Forest. We operate a municipal water system, obtaining both ground and surface water from sources within or near Pike National Forest.

FVAWD is interested in potential and actual oil and gas drilling that could impact our water sources. This includes but is not limited to: policy, environmental impacts, leasing, stipulations, and drilling activity.

FVAWD's interest is limited to activity in or adjacent to the Pike National Forest. More specifically, we are most interested in activity in or near our water shed which is roughly bounded on the south by Mt. Herman Rd. and Rampart Range Rd. to the west and Forest Service Rd. 322 (Balanced Rock Rd.) to the north which includes the following: Mount Herman, Raspberry Mountain, Chautauqua Mountain, Limbaugh Canyon, and upper Monument Creek, and any surrounding areas that may impact our surface or ground water.

Potential Impact to FVAWD Water Supplies.

FVAWD has ground and surface water sources and facilities within or adjacent to Pike National Forest, and has a direct interest in any activity that could impact these water sources. These are the only water sources used to supply potable water for residents within FVAWD. Consequently, FVAWD has a vested interest in insuring the integrity of these water sources and is concerned that drilling activity and activities related to drilling risk contamination to ground and/or surface water.

FVAWD currently intakes surface water from upper Monument Creek in Limbaugh Canyon (by Raspberry Mountain and Chautauqua Mountain). Upper Monument Creek (and therefore our municipal watershed) is located within the Pike National Forest.

FVAWD also has wells that use water from the Denver Basin aquifers. FVAWD has an interest in any activity that could impact the Denver Basin and geological areas that recharge the aquifer. Furthermore, geologic conditions in this area are complex. Monument Creek (as fed from Limbaugh Canyon) runs underground and then reemerges with likely, but not quantified, interactions with the Denver Basin near FVAWD wells.

FVAWD also has plans to expand and improve upon our physical water intake structures, including improved water intakes for surface and alluvial water. We want to be able to freely develop our water rights and expand our capabilities without being impacted by Oil and Gas drilling activity.

Additional FVAWD Concerns regarding Oil and Gas Drilling.

In addition to water integrity concerns, FVAWD may have economic and operational impacts related to drilling activities. These include:

- Costs for additional water quality testing to monitor actual or potential changes to chemicals or other contaminants.
- Potential costs to upgrade water treatment facilities should contaminants be found and/or costs to obtain water from other sources.
- Increased traffic with potential impacts to roads and aging water infrastructure.

Requested Limitations and Stipulations.

FVAWD does not believe that any oil and gas drilling should occur in areas where there are municipal watersheds, aquifers, or recharge zones for aquifers. Therefore, we request that the areas described above be closed to oil and gas drilling. FVAWD also requests that any existing leases be allowed to expire and not be renewed.

Should closure not be possible, FVAWD requests that No Surface Occupancy (NSO) Stipulations be applied to all areas of Upper Monument Creek and that Upper Monument Creek be identified in Forest Service records and documents relevant to drilling activity as a municipal watershed. We further request that Mount Herman, Raspberry Mountain, Chautauqua Mountain, and surrounding areas be identified as water influence zones (WIZ) and that NSO Stipulations be applied to them because their proximity to the edge of the Denver Basin and their role as recharge area for the aquifers. This should include all nearby administrative and historical areas within the Forest Service.

Please include us on all mailing and notification lists. FVAWD will be glad to provide any additional information that may be needed. Please send information or questions to us at:

bod@fvawd.com
and Community Resource Services
7995 E. Prentice Ave.
Suite 103E
Greenwood Village, CO 80111

Sincerely,



Gene Ashe
FVAWD President

Attachment: **Upper Monument Creek sub-watershed within the Fountain Creek Basin**

Figure : Upper Monument Creek sub-watershed within the Fountain Creek Basin

