

<b>Response to Comments Drake 4C Environmental Assessment</b>			
<b>#</b>	<b>Topic</b>	<b>Comment</b>	<b>Response</b>
2	BOT	<p>Question the value of washing vehicles. Would have to clean inside of vehicle as well. There are too many avenues by which NNIS can be brought into the area. Other non-local vehicles, campers, RVs, mountain bikes, personal outdoor gear come into this area and nothing is done to control NNIS. Migratory animals can also introduce NNIS.</p> <p>Washing vehicles is unnecessary. Vehicles are well -maintained and do not carry globs of mud. All non-local vehicles should be monitored.</p>	<p>Existing condition states that two species of NNIS (multi-flora rose, garlic mustard) are already present in the power line. Disturbed soil from this project will present an opportunity for these species to move into the project area and for an additional species, honeysuckle, to take advantage of the more open canopy. It is acknowledged, however, that there are numerous means of dispersal for NNIS, and that many of them cannot be controlled (i.e. bird dropping, flooding).</p> <p>Please note that the mitigation is worded as a recommendation and not a requirement.</p>
2	BOT	<p>Carlton should not be required to provide trees for planting when our assessment acknowledges that there are no trees of value present.</p>	<p>The purpose of planting trees is to expedite canopy closure following the disturbance. It is recognized that aggressive herbaceous growth in the understory will provide competition to planted trees and the natural seeding or sprout growth from surrounding trees may provide more viable seedlings. The Forest Service will not require the planting of trees at this time, but will recommend planting (FS will provide trees) and will monitor the site for seedling survival and the presence and growth of natural tree seedlings.</p>
3	BOT	<p>Is the Wayne seed mixture no longer effective for site restoration?</p>	<p>Aggressive seeding by existing vegetation will quickly re-vegetate the disturbed area. Allowing natural re-seeding is preferable to introducing new seed not native to this bottomland site.</p>

1	HYD	Requiring the woody debris to be disposed of off-site will not guarantee its not becoming debris during a flood. Leaving material in an already wooded area offers some protection from it becoming flood debris and provides some benefit to wildlife.	Large woody debris represents a hazard both to the operator's improvements and to any downstream habitat and improvements. The mitigation is a recommendation that all trees and brush be removed off-site. This is now modified to require "all tree boles and should be removed to a disposal site off Forest Service ownership, and lop brushy debris to less than two feet and spread on site, or chip brushy debris and spread on site.
1	HYD	The drainage behind the tank battery is Mother Nature, not man-made. I do not believe a culvert is necessary.	The blocked drainage behind the tank battery is a condition resulting from developments pre-existing the Drake 4C proposal. The drainage will be re-opened and a culvert installed as a maintenance requirement in Drake 4/4B, not as a mitigation in Drake 4C.
2	HYD	Should not have to remove borings and pit liner from pit. The rock debris in the pit is earth cuttings from the borehole and of no harm to anyone. The pit is proposed to be 5-feet deep. Contents are rock fragments as found on the surface and pit liner is inert plastic that causes no contamination. They used to be furrowed in for soil enhancement.	The Forest Service is concerned that this bottomland site be restored to as natural a condition as possible. There is a concern that floodwaters could dislodge the pit liner and move it downstream. Also, because we want the re-establishment of trees in the area where the pit is located, we do not want an unnatural barrier of heavy plastic and rock fragments in the soil. Therefore we are requiring that the pit contents and pit liner be removed from the site.
2	HYD	Operator objects to maintenance on stream crossings.	Maintenance on stream crossing #2 will be done as part of the special use permit for the access road for wells #4 and 4B, not as a mitigation for Drake 4C.
3	HYD	Woody debris should not be hauled away, but could be burned on site.	Considered as a suggestion for analysis, not as an issue with the proposed action.
3	HYD	A 1991 study determine that the LMR had water quality superior to all other rivers in Ohio, speaking well for area oil and gas producers to manage their operations. We make no mention of this. Oil and gas production must not be environmentally harmful.	Considered as a suggestion for analysis, not as an issue with the proposed action.

4	HYD	Do not remove tree tops from the area, but doze to a site away from the LMR.	The entire project site is located in the floodplain of the LMR.
2	MIN	Operator feels stipulations are a shotgun approach to avoid the drilling of this well. Stipulations are unreasonable, unnecessary and uneconomical.	Mitigations are designed to modify the proposed action to minimize the impact to the environment, not to place undue economic pressure on the operator.
3	MIN	BLM requires unnecessary equipment and makes the pad size too big.	BLM's requirements are independent of the Forest Service analysis of the SUPO.
7	MIN	The Forest Plan does not stipulate that all mineral leases have to be granted, only that they should be made available.	As stated in Chapter 1 of the EA, Carlton Oil is not applying for a lease of federal minerals, but is proposing the development of an additional well on an existing lease that was issued in 1996. As long as stipulations in the lease are met, the Forest Service analyzes the proposal to determine if mitigations are necessary to lessen the environmental impact of a proposed development, not to determine if development is allowed.
7	MIN	EA states that monitoring of well sites is done on a regular basis. Forest Plan M&E Report does not mention any oil well monitoring activity.	Wells drilled on outstanding mineral rights (minerals owned by third parties) are accessed by special use or lease roads. Special uses are inspected annually for compliance with permit conditions. These inspections are not presently included in the Forest monitoring report. A plan is underway to summarize the information from the inspections for inclusion in future reports. The Ohio Division of Minerals inspects private (outstanding rights) wells every 2-3 years.
7	NEPA	The purpose of an EA is not to satisfy the requirement of another regulatory document, even though this document may stipulate the creation of the EA.	The FS decision to allow leasing of federal lands is analyzed in Amendment 8 of the Forest Plan. An EIS was completed for this decision. As specified in the Record of Decision, an additional analysis will be done to determine if any federal lands should be withdrawn from leasing availability. It further specifies that the FS will complete a site-specific environmental analysis of all proposals for development of federal minerals.

7	NEPA	The stated purpose of the Drake Analysis “to allow development...” negates Alternative A.	The Council on Environmental Quality (1502.14) requires analysis of the No Action Alternative (Alternative A). The No Action alternative may not meet the purpose and need.
7	REC	Have not addressed cumulative effects on recreation experiences. Over the long run, we could increase the number of wells beyond the point that anyone will use this section of the forest for recreation at all.	Oil wells are part of the cultural environment in the Marietta area. The addition of this well is not a significant change from the existing condition at the project site. The North Country Trail was placed on the well access road several years after its development for mineral access.
2	WILD	Seasonal tree cutting delays drilling.	All of the Wayne National Forest is considered habitat for the Indiana bat. The Biological Opinion specifies that no tree cutting will take place from April 15 through September 15 to protect bats that may be roosting in trees.

HYD = hydrologic concerns

MIN = mineral management concerns

BOT = botanical/vegetation concerns

REC = recreation concerns

NEPA = National Environmental Policy Act procedural concerns

WILD = wildlife concerns