

Encana Naturally Pressured Lance (NPL) Scoping comments.

Are the Plans to directionally drill ¼ miles from four pads per section?

The scoping states that spacing will be 10 acres. You are planning on 40 acre spacing with the number of wells proposed over 140000 acres.

If you are planning to use Quantum Leap Technology you are to be commended.

The Lance formation in the Jonah field is spaced at 5 acres. What is different about the porosity of the same formation that 10 acre spacing will actually drain the formation? It appears that 40 acres will lead to 10 acres then to 5 acres. This will lead to 15,000 wells vs. 3500 wells in the field.

If that is the case we need to plan up front for 5 acre spacing.

I recommend drilling directionally up to ½ mile and use one 60-72 acre pad vs. four 18 acre pads . This will cut down in the road and pipeline infrastructure needs. Road can be placed down every other section and leave a ¾ mile buffer between pads without roads or pipelines thus providing wildlife a place to be with less disruption to their lives.

The acreage estimates in the scoping statement are vastly under stated. At 72 acres of pads, assuming 4 pad per section, plus required roads, pipeline corridors, compressors and other facilities there are an estimated 13,800 acres. If you assume 2 pads per section that is still 11,800 acres.

In order to verify ground water is being protected during drilling operations I recommend that each cement job be tested by the BLM and scanned electronically to ensure that the cement job is good. Without those steps it is easy to let less than perfect jobs fall through the cracks.

There should NOT be any funding per well to set up any structure similar to the JIO or PAPO office. There is about \$300,000 a year going to salaries in PAPO to administer the program that would be better spent on PETs and NRSs to process APDs and conduct compliance inspections on the ground than to try to dream up ways to spend money that, in all probability, will not actually mitigate impacts to the flora, fauna, air and water in the area.

It is the operator's job to pay for mitigation and the BLM's job to monitor the project regardless of slush funds with a layer of bureaucracy between the decision makers and the public heavily populated by operators with their own self interests at heart.

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