

Recvd
6-20-2023

June 15, 2023

Subject: June 8, 2023 publication of the World Journal Legals Section "Notice of opportunity to comment on One's Own Waste Application for the Walsenburg Carbon Sequestration Project, Huerfano County, CO".

To: Honored Commissioners, Members of the Planning Commission and County Administrator

I am confident that you all will remember the period of methane gas explosions, flames from water faucets, dry wells etc. caused by the Petroglyph Gas and Oil methane exploration years ago. As a long-time resident of River Ridge Ranch, I know I and others remember it all too well. As you are aware the COGCC was able to end the methane exploration after a protracted legal confrontation.

Now we are faced with another potentially dangerous situation with the burial of trees for carbon sequestration. Said burial will provide a source for methane gas once again on River Ridge Ranch and perhaps permit migration of the gas outside the Ranch perimeter. This is an experiment which requires mandatory methane monitoring sensors.

The CDPHE is currently taking comments. As a citizen of Huerfano County and a resident of River Ridge Ranch I would like to see our Commissioners, Planning Commissioners and County Administrator join forces and inform the CDPHE to prohibit such an experiment on River Ridge Ranch. I have included three documents which provide additional information.

Please do not endanger the property or lives of River Ridge Ranch families.

Sincerely,



Richard Goodwin

719-890-0314

vandrgoodwin@gmail.com

PO Box 409

Walsenburg, CO 81089

ATTACHMENTS

Attachment 1 is a copy of the published World Journal CDPHE article.

Attachment 2 is a response sent to the CDPHE.

Attachment 3 is an additional response to the CDPHE.

The following article is from the Huerfano Journal on June 8, 2023 under Huerfano Legals.

**Notice of opportunity to comment on the One's Own
Waste Application for the Walsenburg Carbon Sequestration
Project, Huerfano County, CO**

Facility: Walsenburg Carbon Sequestration Project
Address: Parcel Number 393490, Huerfano County, Colorado

Background:

Huerfano County referred a One's Own Waste Application for review to the Colorado Department of Public Health and Environment (CDPHE) Hazardous Materials and Waste Management Division (HMWMD). The application is for a carbon sequestration project where the property owner will harvest wood waste from within the property boundary and bury the wood waste in an underground vault with an engineered cover system. The intent of the project is to capture and store atmospheric carbon dioxide as a future resource.

The proposed facility is approximately six miles southwest of Walsenburg, Colorado via Cedarwood Trail. We are reviewing the application for technical merit and compliance with the Colorado Solid Waste Act to ensure the proposed project will not negatively impact human health or the environment.

Following the public comment period, we will consider all comments prior to issuing a final decision to approve or deny the application.

Public Comments:

Please submit comments by July 6, 2023 to:
Sarah Foreman, Professional Engineer, CDPHE/HMWMD
4300 Cherry Creek Drive South
Denver, CO 80246
sarah.foreman@state.co.us / 720.251.4841

This application is available for review on our website at
<https://cdphe.colorado.gov/HMWMD-public-notice>.

Walsenburg Carbon Sequestration Project Comment, Land Parcel 393490

1 message

Dick and Virgilia <vandrgoodwin@gmail.com>

Mon, Jun 12, 2023 at 9:45 AM

To: sarah.foreman@state.co.us

Cc: Richard Goodwin <vandrgoodwin@gmail.com>

Ms Foreman,

Re: Input in Response to Notice of Opportunity to Comment on the One's Own Waste Application for the Walsenburg Carbon Sequestration Project, Huerfano County, CO, Land Parcel 393490

I was discussing the proposed Walsenburg carbon sequestration experiment project on land parcel 393490 with a lot owner and I was reminded of our unfortunate experience years ago with methane gas invading our water supply from the methane explorations of the Petroglyph Oil and Gas Company. The COGCC was instrumental in determining the causes of that invasion and representing the state of Colorado in taking corrective action. I testified in federal court along with a number of other lot owners. COGCC was the champion of the people of Huerfano County. It is my opinion that without COGCC's assistance River Ridge Ranch Landowner's Association would most likely not exist today since dangerous methane gas explosions were possible. Who would want to purchase property in such an environment?

After much investigation and research the COGCC determined the subsurface of the land which River Ridge Ranch encompasses is unstable and riddled with channels and dikes which allowed the methane gas to migrate from point to point. River Ridge Ranch is built basically on old coal seams from the time when Walsenburg was a coal producing area. These channels allowed the water soluble methane to migrate and mix with our domestic wells providing our water. Methane explosions, flames from faucets and wells going dry were all experienced. Our property values sank like a rock. As you are aware methane is also off gassed by trees although to a lower amount than CO₂. A fact stated by Dr Zeng who is considered the father of burial sequestration. Burying trees in a vault or under soil allows for higher concentrations of methane to be reached than having the tree above ground with the ability of the methane to dissipate in the atmosphere. If a containment vessel fails not only will CO₂ be released but also methane gas.

I am concerned we shall experience similar conditions with the proposed experimental carbon sequestration project. The underground conditions proven by the COGCC, when coupled with having a landfill of dead trees which may off-gas methane on River Ridge Ranch, is a gamble I and others are not willing to experience. I understand there are vaults to contain the buried trees however I also remember Petroglyph telling us to trust they were drilling too deep to affect our water wells. The COGCC and the subsequent events disproved that assertion.

I understand a monitoring system shall be required to detect unsafe levels of methane. The fact that such a system has to be employed is reason enough to not pursue such a venture where people reside. If there were no dangers from this experiment such a system would not be necessary. A warning of excessive methane will result in what actions? How would residents be notified? Would evacuation of the residents of River Ridge Ranch be necessary? For how long? Where would we go? What agency would control our return? Who would pay for our expenses? If there was an explosion who would pay for the recovery? Who will be held responsible?

I appreciate all the efforts done for carbon removal however I truly believe that based upon our experiences with methane migration, the sequestration project on River Ridge Ranch residential properties is a potential environmental, property value and personal injury disaster for all River Ridge Ranch property owners. There are many, many other locations in Colorado that are not residential areas that would be more suitable for this type of experiment.

I encourage CDPHE to be a voice for Colorado citizens and come to the defense of and protect the citizens of River Ridge Ranch by not approving this experimental project to be conducted. The risks and unknowns are far too many and far too great. Please feel free to contact me with any questions you may have.

Thank you,
Richard Goodwin
719-890-0314
PO Box 409
Walsenburg, CO 81089
vandrgoodwin@gmail.com

Notice of Opportunity to Comment

1 message

Dick and Virgilla <vandrgoodwin@gmail.com>
To: "sarah.foreman@state.co.us" <sarah.foreman@state.co.us>
Cc: Richard Goodwin <vandrgoodwin@gmail.com>

Fri, Jun 9, 2023 at 4:48 PM

Ms Foreman,

Re: Notice of Opportunity to Comment one the One's Own Waste Application for the Walsenburg Carbon Sequestration Project, Huerfano County, CO, published June 8, 2023, Huerfano World Newspaper

The parcel of land (393490) which Mr. Bongiovanni desires to convert to a landfill of buried trees is located within a property owner's association governed by covenants prohibiting such an endeavor. The River Ridge Ranch Landowner's Association is governed by a Board of Managers and duly registered with the Secretary of State as a non-profit organization under Colorado Law. The Association has covenants properly filed with the Huerfano County Clerk which align with the Colorado Common Interest Owner Act (CCIOA). River Ridge Ranch has been a residential community in an agricultural zoned portion of Huerfano County since 2002. It consists of approximately 5800 acres divided into 155 35+ acre lots.

Mr. Bongiovanni originally submitted his sequestration plan to the Board for approval. The Board initially approved a small 'test case' with trees from his personal lot. The Board later denied implementation of the full approach as the Board felt it did not comply with covenants of River Ridge Ranch and could adversely impact our property values to have a landfill within our boundaries. As with all lot owners, Mr. Bongiovanni agreed to abide by the covenants as per his signed deed and is aware of the Board's decision. The decision was provided to Mr. Bongiovanni by the President of the River Ridge Ranch Association at that time, Mr. Tom Weber, and reflected the vote of the Board.

I am a long time owner and resident of a River Ridge Ranch lot. I do not want nor support a landfill of dead trees located anywhere near my property. I am not alone in this. Mr. Bongiovanni has recently approached the Huerfano Planning Board and has been advised he must secure the support of the River Ridge Ranch Landowner's Association Board. Mr. Bongiovanni does not have that approval.

I respectfully request Mr. Bongiovanni's proposal for sequestration of trees on River Ridge Ranch, property parcel 393490, be denied. There are numerous locations within Colorado which could be used for this purpose and not affect a residential community. Landfills should not be located in residential areas and make no mistake about this is a landfill. Pretty it up with fancy words but in the final evaluation it is a landfill. Dig a hole, dump trees into, cover it up and you have a landfill.

Please feel free to contact me regarding this issue.

Thank you,

Richard Goodwin

719-890-0314

vandrgoodwin@gmail.com