



United States
Department of
Agriculture

Forest
Service

Allegheny National Forest
Supervisor's Office

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Warren, PA 16365
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File Code: 2830

Date: April 3, 2007

Robert Gleeson
Pennsylvania Department of Environmental Protection
Northwest Regional Office
230 Chestnut Street
Meadville, PA 16335-3481

Dear Mr. Gleeson:

The Forest Service, surface landowner of the Allegheny National Forest (ANF) in northwest Pennsylvania, files this official objection to the well permit applications submitted by Duhring Resource Company. The objection is for seven (7) wells located in Sheffield Township, Warren County, Pennsylvania on Warrant 2752. This objection pertains to Title 58, Section 601.205 of the Pennsylvania Oil and Gas Act, "Well Location Restrictions."

The wells in objection in Warrant 2752, Lot 7, are numbered 7-18, 7-20, 7-21, and 7-22. The Well (Farm) name is Lot 7 and is located within the Sheffield and Ludlow Quadrangles. The well plats for the objected wells were submitted to the Bradford District Office on March 20, 2007. As proposed, Well 7-18 and the access road would directly impact the North Country National Scenic Trail (NCNST) as administrated by the National Park Service. The NCNST was federally designated as a National Scenic Trail in 1980 under Public Law 90-543. Wells 7-20 and 7-21 are proposed within large spring seeps (wetlands) that drain directly into a wetland west of SR 948. Well 7-22 is proposed within this wetland. Please see the attached pictures.

In addition to objecting to these seven (7) wells, the Forest Service would like to bring to your attention the situation regarding four (4) other wells and their associated roads that are proposed on side slopes greater than 40%. In addition to being on steep side slopes many of these wells are within close proximity (200 feet or closer) to Rock Run, a High Quality Cold Water Fisheries stream as designated by the Pennsylvania Fish and Boat Commission. The first of these wells is numbered 8-43 located in Warrant 2752, Lot 8. The Well (Farm) name is Lot 8 and is within the Ludlow Quadrangle (submitted to the Bradford District Office on March 20, 2007). The other three (3) wells are numbered D-25, D-26, and D-27 located in Warrant 2445, Lot 9. The Well (Farm) name is Lot 9 and is within the Ludlow Quadrangle (submitted to the Bradford District Office on March 22, 2007).

Given the location of these wells we believe that standard Best Management Practices (BMP's) will not be effective in protecting water resources. Therefore, we request your assistance in working with us and the operator to identify site-specific mitigation measures and/or alternative drilling technologies to address these concerns. If you have any questions, please contact Paul Weese at (814) 362-4613.

Sincerely,

/s/ Kathleen S. Morse
KATHLEEN S. MORSE
Forest Supervisor



Duhring Resource Company Well sites/road Objections

Warrant 2752/Lot 7



Wetland adjacent to SR 948, looking upslope towards well sites 7-20 & 7-22



Wetland adjacent to SR 948.



Wetland adjacent to SR 948



Well Site 7-22 Seep draining into wetland



Well Site 7-22



Well Site 7-20 Large Seep



Drainage leading to wetland ((Road layout for 7-20 to 7-22))



Drainage leading to wetland ((Road Layout for 7-20 to 7-22))



Picture of wetland from bank above well 7-22, looking towards SR 948



View of well site 7-18 from North Country National Scenic Trail

Warrant 2445/Lot 9



Proposed Crossing of Rock Run for access to wells D-25 to D-27



Rock Run near proposed stream crossing for wells D-25 to D-27



Steep side slope near proposed crossing of Rock Run



Second proposed crossing of Rock Run