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To:

Cynthia Brown

Chief, Section of Administration Surface Transportation Board Office of Proceedings

395 E Street, SW

Washington, DC 20423

36471

Subject: Docket No. FD ~~36461~~

Dear Ms Brown

As a 45 year career oil/gas geologist, I am writing to express my extreme opposition to the Uinta Railway proposal. Although I love Utah and the great outdoors that exist in that state, and would be involved in opposing this railway in Utah, I live in Colorado and am addressing my concerns about the Uinta Railroads potential impact in one of the most beautiful places on earth. I am still working in the oil/gas community and I gladly spend my time/effort/\$\$ on opposing this railway.

These railroaders, have expressed a possibility of using a new lease (signed with The Colorado Midland and Pacific Railway) to bring Uinta Basin low gravity waxy crude through the Tennessee Pass. This would allow oil tankers to pass through the Arkansas River Valley from Minturn to Leadville to Buena Vista through Browns Canyon National Monument through Salida (where I live) to Canon City to Pueblo, there to connect to lines going to the Gulf Coast refineries. This route includes 120 miles along the Arkansas River.

Please bear with me as I point out various topics.

I really appreciate your time in my behalf.

Uinta Crude:

Unita Basin oil is low gravity waxy crude. I believe that it has to be heated to be transportable in pipelines or by rail. From what I know about oil, when a spill occurs or when an oil accumulation is exposed, the higher end chain hydrocarbons dissipate, leaving behind the lower end, lower gravity products, such as asphalt, tar, wax etc. This tar and wax has to be heated to move or to remove from any surface. Think of asphalt on highways.

Should a spill occur anywhere along the 120 river miles, it WOULD BE IMPOSSIBLE TO REMOVE. What would the cleanup crews do? Drag hot water to the river and use hot water to remove the wax/tar? This is very high elevation country. Even in the hottest of summer nights, it GETS BELOW FREEZING almost every night along parts of this route.

Rafting/fly fishing/kayaking, etc:

This river has more recreational river runners per year than any river in North America. I believe I read the river related economy generates \$73 million/year for Colorado locals? When you go rafting here in the summer, looking downstream or upstream, there are 5 to 10 rafts in front or behind you. This is the destination of THOUSANDS of vacationers and fishermen every summer.

The Arkansas has many miles designated as Rainbow trout Golden Miles, meaning there are a certain number (5000?) rainbow trout per mile. This is some of the most pristine river miles in the country.

See photo below

Ranching/Agriculture:

The local ranches and farmers came to this valley in 1880's to begin ranching and farming. They treat water around here like it is gold, as it is gold.....to them. Any oil spill would devastate their lives. See my "goundwater comments" below.

Geology:

Reminding you that I am a geologist (also, for Colorado Mountain College/Salida Campus) I teach "Intro to Geology with Emphasis on the Arkansas River Valley" and am putting together new courses for the local river outfitters on the geology along their river trips.....so I know in detail what I am saying here), due to the incised nature of this river bed and the underlying glacial sands in this river valley, any oil spill on the river would get into the local ground water immediately. Under the river are hundreds, in some places thousands of feet of sand from the glacial moraines that were deposited just 8 to 12,000 years ago in this valley. The river is tapped into this system with great connectivity.

Any oil spill could potentially move into the groundwater almost immediately.

Geologic Hazards:

As the Arkansas River along most of this 120 mile route is bound by very high, very rocky, very unstable terrain, there are continuous rock slides (ask the Colorado Highway department how much they spend every year repairing the highways from rock falls, landslides running along the river, especially from Salida to Canon City!!!).

There are continuous avalanche risks, landslides, flooding and even an occasional earthquake.

So, it doesn't even matter if the railroad company can keep their tracks 100% secure from all of these geohazards, what if a rockslide or other calamity happens as an oil tanker train with 100 cars of Uinta crude is going through Browns or other canyons here? **The railroad company cannot possibly guarantee that cannot happen, no matter what experts they are in keeping the rails secure.**

Economics:

As an oil gas geologist, I know about the economics of oil/gas. The Uinta Basin oil companies drilled their wells when oil prices were high. As did the 10,000's wells got drilled in West Texas shale plays in the last 5 years. So, oil prices crater and their economics are not viable within their current plan, which involves getting their very expensive oil to refineries in Salt Lake City? See articles below?

So what is the answer? Spend millions of dollars on a railroad, with part of it through BLM lands, through National Forest lands, through Browns Canyon National Monument, along the most beautiful river in western US, risking so so many things and peoples livelihoods, so that several companies based in Houston Texas can make more money, get better bonuses, more stock options for their Uinta Basin project that is not economical??? So.....does that make sense?

I realize it is a 2020 world and nothing makes sense any longer, but this railroad plan, especially the part through Colorado, in terms of economics, geohazards, risks/reward.....MAKES NO SENSE.

Excuse my English but this all sums up to this 70 year old, who has seen some shit in his lifetime, as the dumbest of ideas I have ever witnessed.

The only other dumb idea that comes this close is the lately proposed tram to the bottom of the Grand Canyon.

Dumb, Dumb, Dumb.

One last thought.

When oil prices recover and the West Texas shale play opens back up their wells, Uinta oil will still not be economical compared to that basin, so they will continue to ask for various forms of \$\$\$ help to make their project economical? That is not how oil/gas economics works. FYI, there are BILLIONS OF BARRELS of oil stranded in Canada due to economics. Too bad. They took the risks. Now they are paying the prices of bad decisions. Same should apply to Utah producers.

Thank you for your time in my behalf and for reading this.

Sincerely !!!!

Dan Cox

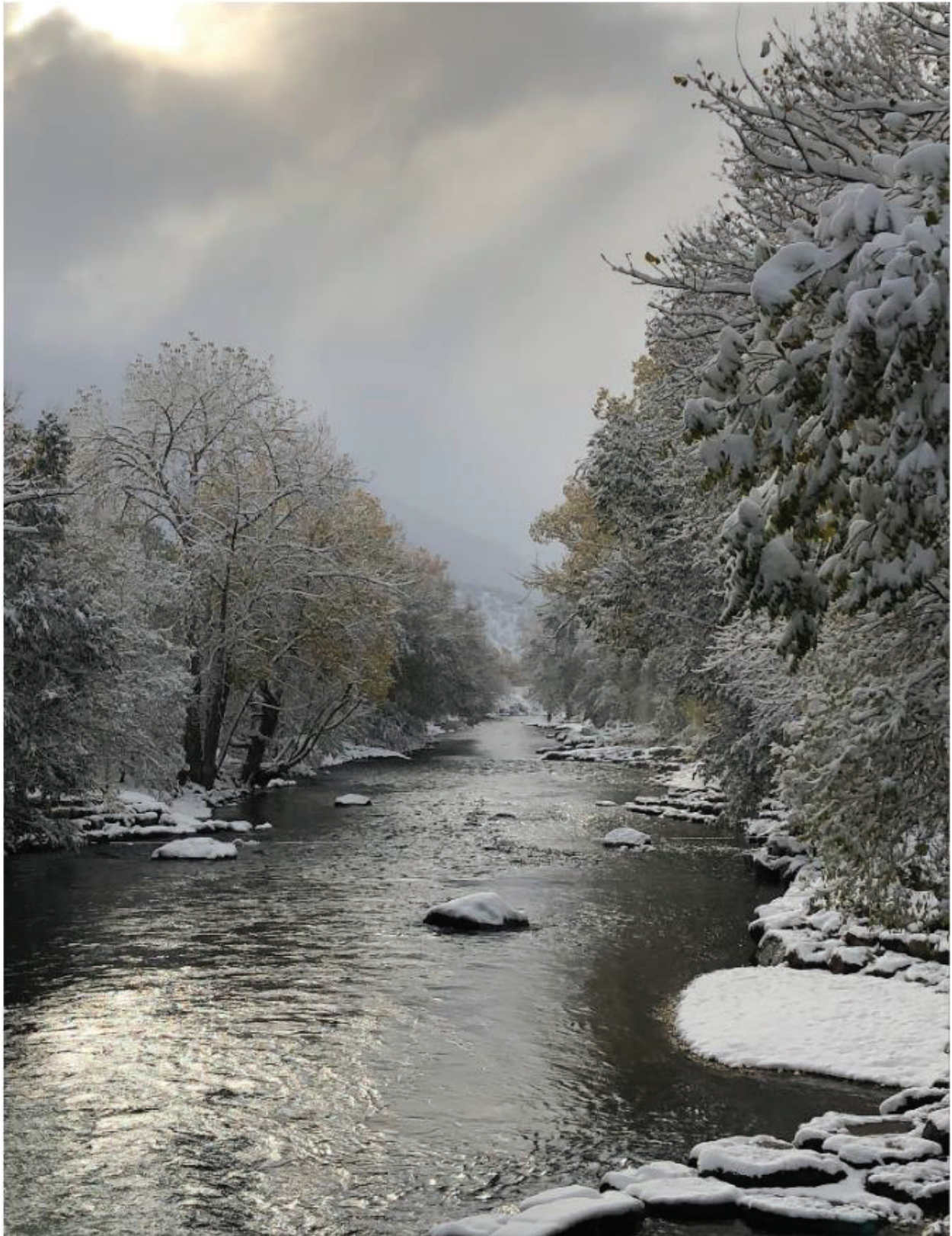
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CC: Parties of Record

Railroad track is to the left of these trees



Here are just a few websites I found within 5 minutes, addressing various issues about this railway.

<https://btuanalytics.com/shale-production/uinta-basin-economics>

<https://www.deseret.com/utah/2020/5/5/21246902/pandemic-covid-19-oil-industry-crumbling-under-coronavirus-pressure>

<https://ubmedia.biz/news/10290/state-report-paints-grim-near-term-future-for-uinta-basin-oil-and-gas-industry/>

<https://www.kuer.org/energy-environment/2020-08-05/environmental-lawsuit-says-30-million-uinta-basin-railway-is-a-misuse-of-oil-and-mining-royalties>