

Number of Wells

This project description talks about the development of twelve wells and a production facility sized, more or less, for production from twelve wells. Will the EIR analyze a project that purports to drill only twelve wells or twelve producing wells?

Over the past century at least fifty-two prospect holes have been drilled in the Huasna Basin, only six of which have produced oil. That is a 12 percent success rate. Now with modern directional drilling technology it may be possible for Excelaron to have a higher success rate, but any assumption of a 100 percent success rate is unreasonable for the EIR to assume.

If Excelaron is asking for a permit to operate an oil production facility with twelve operating oil wells, then the EIR must consider that the drilling operations to find those twelve producing oils wells might take considerably longer than the drilling operations required to just drill twelve holes. Therefore there may be cumulative impacts due to additional drilling operations to find twelve production wells.

(I'd like to return to the slide showing the project site from Huasna Townsite Road.)

When I look at this slide I can't help but wonder, with today's modern directional drilling technology, why they wouldn't just slant drill from the shipping site to reach the same area they could reach from drilling way up on the hill? Their facilities could be consolidated and easier to insulate against noise, they wouldn't have to transport heated water three quarters of a mile uphill, and their affect on the aesthetics of the valley would be lessened.

I hope the EIR will consider such a consolidation of their facilities as an alternative.