



FILED
2017 SEP -6 PM 3:06
REGIONAL DEPARTMENT VI
The Nature Conservancy
Oklahoma Chapter
10425 S. 82nd E. Avenue
Suite 104
Tulsa, OK 74133

September 1, 2017

Ms. Lorena Vaughn
Regional Hearing Clerk (6RC-D)
U.S. Environmental Protection Agency
Region 6
1445 Ross Avenue, Suite 1200
Dallas, TX 75202-2733

via email and first class mail

Re: SDWA-06-2017-1110 (Jireh Resources, LLC)
SDWA-06-2017-1111 (Warren American Company, LLC)
SDWA-06-2017-1112 (Novy Oil and Gas, Inc. (Grayhorse Operating, LLC))

Dear Ms. Vaughn:

Thank you for the opportunity to submit comments regarding the U.S. Environmental Protection Agency's above referenced proposed Administrative Orders. The Nature Conservancy is very supportive of these EPA efforts to address the serious water quality problems that have become apparent in Bird Creek over the past year. The Nature Conservancy's 40,000-acre Tallgrass Prairie Preserve is located about one mile to the east from the impacted stretch of Bird Creek.

Osage County is an important place to The Nature Conservancy. Over the past 28 years, we have established and managed a fully functional tallgrass prairie ecosystem at our Tallgrass Prairie Preserve. We are fortunate to be in a community which supports the conservation of the tallgrass prairie and its ecosystem, and to work alongside so many landowners in Osage County with like-minded goals. The Conservancy shares the community's concerns regarding the need to ensure high water quality for the benefit of people, our economy, and nature.

As a landowner and member of the Osage County community, the Conservancy recognizes the importance of the mineral estate to the Osage Nation. The Conservancy has always worked collaboratively with the lease holders and Bureau of Indian Affairs to minimize environmental impacts of the oil and gas activity. By working together, we have been able to reduce some of the impacts of the more than 200 operating wells that are on our preserve.

From what we can gather from past press stories on the Bird Creek situation, the water quality impacts may be related to deteriorating or substandard equipment and infrastructure in

saltwater disposal wells in area oil fields. If that is the case, we encourage you to also assess the status of the oil field infrastructure on the Tallgrass Prairie Preserve that is adjacent to the Bird Creek impacted area, some of which is over 100 years old. The legal location of the oil field leases on Conservancy property are: SW/4 of Section 17 and the SE/4 of Section 18, all in Township 27 North, Range 8 East, Osage County, OK.

Thank you for considering these comments. If you have any questions or would like any additional information, please feel free to contact me at 918-585-1117 or at mfuhr@tnc.org.

Sincerely,

A handwritten signature in blue ink, appearing to read "Michael Fuhr", with a long horizontal flourish extending to the right.

Michael Fuhr
Oklahoma State Director