



# United States Department of the Interior

## BUREAU OF LAND MANAGEMENT

Moab Field Office  
82 East Dogwood  
Moab, Utah 84532



3100  
UTU82619  
(UTY012)

Mr. Brad Hill  
Utah Division of Oil, Gas and Mining  
P.O. Box 145801  
Salt Lake City, Utah 84114-5801

SEP 30 2010

Re: Protest Withdrawal  
Cause No. UIC-358.1  
Application for Class II Injection Well  
Westwater Farms, LLC  
Harley Dome 1 SWD  
Section 10, T19S, R25E  
Grand County, Utah

Dear Mr. Hill:

In the interest of ensuring that Federal oil and gas resources would not be degraded, the Moab Field Office of the Bureau of Land Management (BLM) filed a protest of the above referenced Cause on August 27, 2010. A summary of concerns identified in the protest include the potential for the proposal to generate hydrogen sulfide gas, uncertainty of the confining capability of the Kayenta Formation and, more generally, the shallow nature of the proposed injection zone which crops-out in the Colorado River canyon five miles away.

Since filing the protest, our staff has met with the proponent and their consultants, and the exchange has continued by email. Through the course of this communication, the proponent has provided sufficient evidence that the reservoir conditions in this instance are not favorable for hydrogen sulfide generation, and that operational controls will be applied to further minimize the possibility of reservoir souring. Additionally, the proponent has provided electric log data and comparative water analysis data which indicates the Kayenta Formation, locally, is a suitable confining layer to isolate the Entrada Sandstone helium reservoir above, from the proposed Wingate Sandstone injection zone below. Finally, the proponent has presented evidence that the Wingate Sandstone is sufficiently higher structurally, at the nearest Colorado River outcrop, relative to its position at the proposed injection well, to minimize the possibility of injection resulting in surface expression at the river.

In summary, the concerns expressed in our notice of protest have been suitably addressed by subsequent consultation with the proponent. We therefore respectfully withdraw our protest. Should you have any questions regarding this matter, please call Eric Jones of this office at 435-259-2117.

Sincerely,

s/ Jeffrey R. Smith

Field Manager

cc: Allin Proprietary (consultant for Westwater Farms, LLC)  
475 Seasons Drive  
Grand Junction, CO 81507-8749  
UT922, Utah State Office  
EJones:mm:9/24/10

