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/

J1. Darden, Mary Landon

From: Mary Darden [Mary_Darden@baylor.edu]
Sent: Wednesday, June 20, 2007 2:38 PM
To: FutureGen.EIS@netl.doe.gov
Cc: Robert_Darden@Baylor.edu
Subject: Comment for hearing

Importance: High

Dear Mr. McKoy, et.al:

#1 | I am hereby registering my official opposition to any proposed coal-related plants in the state of Texas. We need to be replacing coal plants with energy-generating options that are clean (like wind power) in an attempt to bring our air back into acceptable parameters. Please accept this email as my statement at the hearing this Thursday evening in Buffalo, Texas.

Sincerely,

Dr. Mary Landon Darden
118 N. 30th Street
Waco, Texas 76710
254-752-1468
Mary_Darden@Baylor.edu

J1. Darden, Mary Landon

Response to Comment #1:

Air emissions of coal-fueled power plants and a discussion of estimated emissions of FutureGen are discussed throughout the EIS, in Section S.7.5.2; Section S.9; Table S-12; Section 2.5.6.1; Section 3.1.2; Table 3-3; and Section 6.2. Additionally, federal and state regulatory and permitting requirements are discussed in Section C.1.2.

DOE oversees numerous projects that are investigating and supporting a wide variety of renewable energy generation technologies, including many based on renewable sources wind, solar, and hydro.

J2. Darden, Robert

From: dooreditor [dooreditor@earthlink.net]

Sent: Wednesday, June 20, 2007 2:27 PM

To: FutureGen.EIS@netl.doe.gov

Cc: Mary Darden

Subject: Proposed Jewett Plant

#1 Please be advised that we are very much opposed to your company's proposed presence in Central Texas. Much of Texas is already in EPA non-attainment status. Yet another plant -- particularly an experimental plant of this nature, one with no guarantees to its effectiveness -- would be an environmental disaster.

I belong to a large coalition of organizations that will strenuously oppose this plant if you attempt to locate it in Jewett, using whatever legal and economic means are available to us.

Robert Darden
P.O. Box 1444
Waco, TX 76703-1444

J2. Darden, Robert

Response to Comment #1:

Air emissions of coal-fueled power plants are discussed throughout this EIS in Section S.7.5.2; Section S.9; Table S-12; Section 2.5.6.1; Section 3.1.2; Table 3-3; and Section 6.2. Additionally, federal and state regulatory and permitting requirements are discussed in Section C.1.2.

J3. Brazos Valley Council of Governments (Wilkerson, Tom)

Public Hearing Oral Comment (see full transcript in Appendix K)

15 MR. WILKERSON: Tom Wilkerson, Brazos Valley
16 Council of Governments. Mark, thank you for you and your team
17 and -- and all the contractors, we appreciate the great job
18 that you have done.

19 All the COGs in Texas are designated by the
20 governor to be the state-appointed contact for state level
21 review and comments on projects like this. So if this were a
22 state project we would have been charged with that process. So
23 within the COG staff we have the ability to review documents,
24 all 2,000 pages, for the purpose of commenting and -- and
25 making sure that it's a benefit to our community. We thank you

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1 for the opportunity to do that on this project and we support
2 FutureGen coming to the Brazos Valley -- I mean The Heart of
3 Brazos.

4 The -- we gave everyone the opportunity to sign
5 in today a document of support. Instead of having 400 people
6 come and tell you how much they support, we listed -- gave them
7 the opportunity to sign. So I would like to read this and
8 there is 70 plus signatures on this that will then be turned in
9 as a part of the official record.

10 As a unified voice The Heart of the Brazos
11 residents would like to express our support for the FutureGen
12 Project and The Heart of the Brazos proposal. This comment is
13 being submitted by Tom Wilkerson, the Brazos Valley Council
14 Government, Post Office Drawer 4128, Bryan, Texas, 77805. By
15 signing this document of support we are expressing our support
16 through one submitted comment. We believe that selecting The
17 Heart of the Brazos site will continue to benefit the project
18 through the years due to the location, resources, industrial
19 support and experienced workforce. FutureGen is welcome to our
20 region. Thank you very much.

#1

Response to Comment #1:

Comment noted and will be included in the Administrative Record of the EIS.

J4. Willis and Allen Construction (Allen, Jerry A.)

FutureGen Project

Environmental Impact Statement for Implementation of the FutureGen Project
U.S. Department of Energy, National Energy Technology Laboratory

PUBLIC HEARING COMMENT CARD

JEWETT

PLEASE PRINT CLEARLY. IF MAILED, PLEASE HAVE THIS CARD POST-MARKED ON OR BEFORE JULY 16, 2007.

#1

*Good Presentation of the project at the meeting
in Buffalo.
Hope you can check Jewett*

I WOULD LIKE TO RECEIVE A COPY OF THE FINAL FUTUREGEN EIS HARD COPY CD / SUMMARY

NAME *Jerry A. Allen, P.E.* ORGANIZATION *Willis & Allen Construction*
ADDRESS *RT 2 Box 66* CITY *Teague* STATE *TX* ZIP *75860*
E-MAIL ADDRESS *jalden@windstream.net*

J4. Willis and Allen Construction (Allen, Jerry A.)

Response to Comment #1: Comment noted and will be included in the Administrative Record of the EIS.

J5. Limestone County Sheriff (Wilson, Dennis D.)

FutureGen Project

Environmental Impact Statement for Implementation of the FutureGen Project
U.S. Department of Energy, National Energy Technology Laboratory

PUBLIC HEARING COMMENT CARD

JEWETT

PLEASE PRINT CLEARLY. IF MAILED, PLEASE HAVE THIS CARD POST-MARKED ON OR BEFORE JULY 16, 2007.

#1

I Am IN Full Support of Future Gen Project being located at the Jewett Texas site. This site meets ALL the Requirements for this New project. We FEEL WE have the best of everything to offer to support this project. I know we can offer the best work force AS WELL AS supporting people in this endeavor WE LIVE IN A VERY beautiful AREA of Texas with lots to offer! I Also know that citizens in Limestone Freestone & Leon support Future Gen. The Brazos Valley Cog & H.O.T. Cog are also supporting this project to its fullest! Thank you for selecting our Jewett site.

I WOULD LIKE TO RECEIVE A COPY OF THE FINAL FUTUREGEN EIS HARD COPY CD / SUMMARY

NAME Dennis D. Wilson ORGANIZATION Limestone County Sheriff
ADDRESS 1221 E. Yenger St. CITY Groesbeck STATE TX ZIP 76642
E-MAIL ADDRESS d.wilson@co.limestone.tx.us

J5. Limestone County Sheriff (Wilson, Dennis D.)

Response to Comment #1: Comment noted and will be included in the Administrative Record of the EIS.

J6. Commissioner, Texas Railroad Commission (Williams, Michael)

Public Hearing Oral Comment (see full transcript in Appendix K)

19 MR. WILLIAMS: Mark, thank you. On behalf of
20 Governor Perry, myself, as well as the FutureGen Texas team,
21 let me welcome you to an area in your home quite frankly. You
22 know, I've spent most of the afternoon, morning and afternoon
23 with Governor Perry in Houston and I would be remiss if I did
24 not say thank you to The Heart of Brazos team, Tom, you and
25 your folks, for all of the hard work you put in to helping the

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1 state capture this project, and I'd also be remiss if I did not
2 say thank you, Tom, to you and Mark, and of course Jerry, for
3 what you've been doing with us and working with us.

4 I only have one substantive comment as it
5 relates to the NEPA process and to the EIS because I'm going to
6 leave it to -- to perhaps others to make our official comment,
7 and that is quite frankly to say what I've said before is that
8 we commend the fact that the project, that the -- the analysis
9 was thorough, was concise, and we appreciate the sort of
10 relationship that we've had with you working through this.

11 Jerry, you had mentioned, as I get ready to
12 leave, you mentioned that you came to this area nine months
13 ago?

15 MR. WILLIAMS: In August, you came back today,
16 and I think there's something about the third time being a
17 charm. So I look forward to you coming back to Texas on the
18 day after the decision is made, because as we said in the
19 video, in the DVD, you bring FutureGen to Texas, we'll do you
20 right. Y'all take care now.

#1

J6. Commissioner, Texas Railroad Commission (Williams, Michael)

Response to Comment #1: Comment noted and will be included in the Administrative Record of the EIS.

J7. Leon County Judge (Ryder, Byron)

Public Hearing Oral Comment (see full transcript in Appendix K)

#1

2 MR. RYDER: Byron Ryder, Leon County Judge. I
3 just want to tell you, first of all thank you for being here,
4 it's a great support. We couldn't do this without you and it's
5 taken all these people in this room to get this to this point.
6 There's people behind the scenes doing things, but because of
7 your enthusiasm and your push on us we have gone this far, and
8 I think just a little bit more push and we're going to have
9 them here for the third time like we talked about. But we
10 definitely want them here for the third time. I do believe
11 that. Don't we, is that right? You know, there's been three
12 real important people, other than all the volunteers, but we've
13 had Nucor Steel, Westmoreland Coal, NRG, those people have
14 supported this 100 percent. They have been behind us, they've
15 given us all the support we need, they've given information we
16 need, and we need to give them a hand. I would appreciate it
17 right now.

18 And as for the DOE, they have done an
19 outstanding job with this environmental statement. They are
20 very -- have done a good, they've been very thorough, have
21 treated us very well I feel like in the -- in the statement,
22 and we commend very much to -- to -- maybe this particular
23 statement will be the winning statement, not maybe, it will be
24 the winning statement. And we need, we want them here, and
25 we'd like to welcome you back any time. Thank y'all very

Page 25

1 much.

J7. Leon County Judge (Ryder, Byron)

Response to Comment #1: Comment noted and will be included in the Administrative Record of the EIS.

J8. Burkeen, Daniel

Public Hearing Oral Comment (see full transcript in Appendix K)

4 MR. BURKEEN: I'm Daniel Burkeen, Limestone
5 County Judge, and I'll try to be brief. I want to join in
6 Judge Ryder's comments that he made appreciating those folks,
7 and I also want to thank Judge Ryder for all the work he's
8 done. He's been very actively involved in this project here in
9 Leon County and in the area, so we appreciate all that he's
10 done.

11 We're excited about this project over in
12 Limestone County. We've got the NRG power plant there, we've
13 got a very good working relationship with NRG. We've had a
14 coal powered plant there for a long time in Limestone County.
15 We've got a good working relationship with them. They've been
16 a very vital part of our community. We're looking forward to
17 FutureGen. The environmental processes involved in FutureGen
18 are exciting. They're an exciting part of the future worldwide
19 and we're excited to have this prototype plant I'm hoping will
20 be right here in our area. We're excited about it and
21 appreciate the so many that have been involved in this
22 process. Thank you.

#1

J8. Burkeen, Daniel

Response to Comment #1:

Comment noted and will be included in the Administrative Record of the EIS.

J9. Jackson Jr., Ivan

Public Hearing Oral Comment (see full transcript in Appendix K)

25 MR. JACKSON: First of all I'd like to say I am

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1 very excited about -- about FutureGen coming here. Near zero
2 emissions. As a rancher myself, we have a very -- a rather
3 large ranch in northern Limestone County and also as the area
4 chairman for Ducks Unlimited, Mexia Ducks Unlimited. We're
5 also one of the largest conservation -- we are the largest
6 conservation group in the world. Our chapter in Mexia is one
7 of the largest in the nation, we're in the top 50 right now.
8 There's over 13,000 chapters. We're very excited about the low
9 emissions. I want to thank y'all for the thorough impact
10 statement you've provided, and we're just very excited to go
11 ahead with the project and look forward to y'all coming back to
12 Limestone County real soon. Thank y'all.

#1

J9. Jackson Jr., Ivan

Response to Comment #1:

Comment noted and will be included in the Administrative Record of the EIS.

J10. Benedict, Kevin

Public Hearing Oral Comment (see full transcript in Appendix K)

23 MR. BENEDICT: My name is Kevin Benedict. I'm
24 an independent businessman from Freestone County. I also
25 represent Freestone County in all of its economic development

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1 endeavors.

2 I too would like to thank the Department of
3 Energy and all the subcontractors not only for providing such a
4 voluminous document but doing it in record time. As you can
5 see, we're all excited about the project. We're excited about
6 the possibilities of -- of -- of FutureGen coming to Texas and
7 to do it in record time and as thoroughly as it has been done
8 is commendable and we appreciate your hard work in that
9 regard. Thank you.

#1

J10. Benedict, Kevin

Response to Comment #1:

Comment noted and will be included in the Administrative Record of the EIS.

J11. Milberger, Lionel J.

Public Hearing Oral Comment (see full transcript in Appendix K)

12 MR. MILBERGER: Okay. Can you hear me? My name
13 is Lionel Milberger. We currently live in Wimberly, Texas, and
14 I want to thank you for allowing me to speak to you this
15 evening.

16 First of all, I want to thank the Department of
17 Energy. I want to thank the Department of Energy for your
18 efforts in helping to provide affordable and clean energy to
19 the ordinary citizen that lives on the land. You're to be
20 complimented for that effort and I think our tax money is
21 wisely spent therein. Now, but what I would like to do is to
22 inform you of numerous already existing emission sources that
23 exist in the area and -- and to express a few concerns that I
24 have.

25 Now first of all, we own a home also in

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1 Robertson County, an adjoining county, and in that county there
2 are numerous emission sources that I hope you probably already
3 have, but if you haven't I'd like you to reconsider the large
4 number of emissions that are present in that county and there
5 are probably similar ones present nearby also. But, for
6 instance, there is eight or nine emu gas plants and numerous
7 blackhole dehydration sites. There are hundreds of sour gas
8 wells with treating equipment at the site including the
9 scavengers. All of this submits to the air. Now I want to --
10 I want to -- although I have concerns for a lot of those things
11 other than air emissions, but the time is short, I only got
12 five minutes so I'm going to restrict my comments to only the
13 air emissions.

14 There's many compression stations, phase
15 separators, there are miles and miles of pipeline. There is
16 two or three lignite coal fired power plants. Some already
17 operational in that county, one recently just permitted. There
18 are many injection wells. Injection wells I'd like to talk
19 about because of the sequestration but time is not going to
20 allow me to do that. Now, there are many heaters and blowers
21 and hundreds of chicken houses.

22 Now, all -- all of this equipment is emitting
23 large emissions to the air and these emissions include acid gas
24 and they include various other materials such as noxin and CoC,
25 and I can appreciate and I do appreciate the fact that this

#1

J11. Milberger, Lionel J.

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1 plant is said to be low in emissions, but when added to these
2 already existing sources I want that to be considered.

3 Now, there are also V-tech emissions emitted at
4 these sites and on top of that there's huge quantities of
5 carbon dioxide. Now carbon dioxide's a big issue, it's a big
6 issue with this plant, and there are some proper things that
7 are being talked about to handle that carbon dioxide, but
8 carbon dioxide is being already emitted in huge quantities in
9 Robertson County from the gas treatment sites. About 5 to some
10 15 percent of that natural gas is carbon dioxide. All of that
11 is removed and spewed to the air.

12 Now, and in that county there are -- there's --
13 there's a desire in that county for emission sources and there
14 probably will be new and more to come as this project is done
15 if it's done here.

16 Now, now I want to talk a little bit about what
17 we have here in Texas because air emissions in my mind is a big
18 deal partly because of the sources that I've already mentioned
19 and yours will add to it somewhat. The T.C.E.Q. does not
20 control emissions from oil and gas well sites. I'm glad to
21 know there's a Railroad Commission member here. Now, T.C.E.
22 does not control the following types of pollution. They don't
23 control visual pollution, noise pollution, light pollution and
24 increased traffic. Now, the T.C.E.Q. also has some
25 shortcomings. For instance, I want to point out to the

#1

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1 audience, that the single most important gas in the atmosphere
2 for humans to be viable, of course, is oxygen. Now the
3 T.C.E.Q. does not regulate, control, or maintain the quantity
4 of oxygen in the air. Now furthermore, T.C.E. does not control
5 emissions to the air of other materials, specifically included
6 is methane, Ca4. Also included is ethane, hydrogen, nitrogen,
7 water vapors. Water vapors don't sound very bad, don't have
8 time to talk about it today but it's important. And on top of
9 that it's not even mentioned as far as controlling the carbon
10 dioxide, this is T.C.E.Q.. Now, it's believed, hopefully from
11 sources that emit large quantities of carbon dioxide, since it
12 is heavier than air by about 1.5 times, one-and-a-half times,
13 it can quickly move to the ground and reduce the oxygen content
14 in the air for local residents.

15 Now, the Railroad Commission, the Railroad
16 Commission, also in Texas, a very important agency, but it does
17 not limit, prohibit, or control the emissions to the air of any
18 material except for material that has a commercial value, and
19 the operators determine whether it has a commercial value. So
20 so far as air emissions are concerned, from here again Texas, I
21 want to point out that I think we're somewhat lacking and you
22 should take that into consideration and I would urge you to do
23 that.

24 So if during planning, drilling, operating and
25 maintaining this facility you come to me and say it is in full

J11. Milberger, Lionel J.

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#1

1 compliance with all T.C.E.Q. and the Railroad Commission rules
2 and requirements, I will not be impressed. I want to thank you
3 for the opportunity to make this statement and if you have any
4 questions I'll be happy to try to answer them, and I thank you
5 very much.

6 MR. McKOY: Thank you. We definitely do need to
7 consider all sources of air emissions and it is something that
8 I think we can look into much further. The next commenter is
9 Gary J. Mech -- Mechler, NRG-Texas.

J11. Milberger, Lionel J.

Response to Comment #1:

Existing air quality and the impacts of the FutureGen Project on air quality and its conformance with state and federal criteria for the Jewett Site are provided in Section 6.2. As stated in Appendix C, Part C.1.2, the FutureGen Project would be required to obtain a Prevention of Significant Deterioration (PSD) construction permit and Title V operating permit. The State of Texas (through the Texas Council of Environmental Quality) has the authority to issue these air permits. Goals of the PSD process include ensuring that clean air resources are preserved during economic growth and the protection of human health and welfare for adverse effects of air pollution. This process takes into account existing and planned emission sources. Sources modeled to predict the incremental increase in criteria pollutants include the proposed project and other large sources of air emissions. DOE will consult with TCEQ regarding information available on existing and planned local emission sources. Existing smaller sources of air pollutants are generally assumed to be a part of the measured regional background concentrations of criteria pollutants. It is important to note that DOE used conservative assumptions for air emissions to represent the upper bound of the range of possible impacts (see Appendix E-Air Modeling Protocol). Using these conservative assumptions, the air modeling for the Jewett Site showed that the FutureGen Project would not exceed the Class II PSD allowable increments. The Texas Railroad Commission would not have jurisdiction over the air permitting for the project, but would have safety jurisdiction for project-related pipelines (such as natural gas and CO₂ pipelines).

J12. Limestone Power Plant (Mechler, Gary J.)

Public Hearing Oral Comment (see full transcript in Appendix K)

10 MR. MECHLER: Thank you. I'm Gary Mechler. I'm
11 the general manager of Limestone Power Plant. I'd just like to
12 comment that our existing plant through the permitting, the
13 construction, the operation of the plant over the last many
14 years, over twenty years, that the local community here has
15 been extremely supportive of our plant, our employees, and I'd
16 like to thank you for that. It's been a -- I've been here at
17 the plant for two years and I've just been very impressed with
18 the -- with the support of the community for our plant.

19 As you know, NRG is going to offer to donate 400
20 acres of reclaimed mine property for the plant. It's an area
21 where the lignite's already been mined, it's reclaimed. You've
22 seen the pictures on the video, it's a beautiful site. We look
23 forward to the plant coming there. We've also offered to -- to
24 help the Alliance. We've been working with the Alliance to
25 provide various services that can help, that can help the

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1 FutureGen site come to this area, and we look forward to that.

2 As he earlier said, we'd like to thank the DOE,
3 the contractors for the preparation of the Environmental Impact
4 Statement. We think it's thorough, we think it's accurate, and
5 we just look forward to the -- to the FutureGen site coming
6 here to Jewett. Thank you very much.

#1

J12. Limestone Power Plant (Mechler, Gary J.)

Response to Comment #1: Comment noted and will be included in the Administrative Record of the EIS.

J13. Mayor, City of Fairfield (Hill, Roy)

Public Hearing Oral Comment (see full transcript in Appendix K)

#1

4 MR. HILL: I'm Roy Hill. I'm the mayor of
5 Fairfield, Texas, and we support the FutureGen Project. I -- I
6 know I'm joined by our County Judge, Linda Grant who's sitting
7 out there and I'm looking at her and she's nodding yes so
8 that's a good thing. We support you. We think you're doing a
9 wonderful thing. We want to see affordable and reliable power
10 in Texas and we want to see a cleaner environment. We applaud
11 you guys in what y'all are attempting to do. You have our full
12 support and the only other thing is that we want Jewett to get
13 the site.

J13. Mayor, City of Fairfield (Hill, Roy)

Response to Comment #1:

Comment noted and will be included in the Administrative Record of the EIS.

J14. Limestone Commissioner (Kirgan, William P.)

Public Hearing Oral Comment (see full transcript in Appendix K)

#1

17 MR. KIRGAN:: I am William P. Kirgan, Limestone
18 Commissioner, Precinct 2. I want to say to FutureGen on behalf
19 of my County Judge, Daniel Burkeen, we welcome you, FutureGen.
20 And I'm that noisy guy that asked him that question about the
21 mercury and he highly satisfied my answer -- my question.
22 Thank you.

J14. Limestone Commissioner (Kirgan, William P.)

Response to Comment #1: Comment noted and will be included in the Administrative Record of the EIS.

J15. Grant, Linda

Public Hearing Oral Comment (see full transcript in Appendix K)

#1

1 MS. GRANT: My name is Linda Grant and I'm the
2 Freestone County Judge. Our county is very excited about this
3 project. We're excited about the technology. We know that our
4 area has the resources, that we're going to have some type of
5 energy generation in this area, and we believe that this
6 technology will help us in the future to have the cleanest
7 technology that we can in place. So we welcome you and look
8 forward to having this project come to our area. Thank you.

J15. Grant, Linda

Response to Comment #1:

Comment noted and will be included in the Administrative Record of the EIS.

J16. City of Mexia (Brenner, Juanita)

Public Hearing Oral Comment (see full transcript in Appendix K)

#1

19 MS. BRENNER: I'm Juanita Brenner. I actually
20 hail from Houston County, but I do have service area of
21 thirteen counties in the general area of home health, and I
22 have Assisted Living in Mexia, Texas, so I'm speaking on behalf
23 of Mexia, Texas, at this time. I think FutureGen is a
24 wonderful thing that will help service the energy needs of our
25 state and also that if it will reduce emissions from the coal I

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1 think that is a wonderful thing. I'm thinking about all the
2 people that have C.O.P.D., congestive heart failure, and a lot
3 of other things that happen to people. So I'm here on behalf
4 of the medical community because if this will help all these
5 people live a better life, I think that we should be for it,
6 and thank you FutureGen and the DOE.

J16. City of Mexia (Brenner, Juanita)

Response to Comment #1:

Comment noted and will be included in the Administrative Record of the EIS.

J17. Abernathy, Jan

Public Hearing Oral Comment (see full transcript in Appendix K)

#1

22 MS. ABERNATHY: I'm Jan Abernathy. I live in
23 Limestone County, I own a business in Leon County, a
24 construction services company, a lot of you know me, and I
25 think we're really looking forward to this. I employ a lot of

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1 people in the area and everyone I know is for it and we're
2 really excited. Thank y'all for coming.

J17. Abernathy, Jan

Response to Comment #1:

Comment noted and will be included in the Administrative Record of the EIS.

J18. Brazos Valley Seven County Regional Workforce Development Board (Ryder, Diane)

Public Hearing Oral Comment (see full transcript in Appendix K)

#1

5 MS. RYDER: My name is Diane Ryder. I think
6 many of you know that I wear many hats in the area. I am
7 chairman of our Brazos Valley Seven County Regional Workforce
8 Development Board, and I would just like to say that over the
9 past year we have already been working to put in place programs
10 to train the work staff that this plant will require in the
11 construction phase as well as in the developmental phases of
12 it, and I just wanted you to know that the whole seven counties
13 that I represent are very much in favor of this project and
14 we're looking forward to it coming to our location.

J18. Brazos Valley Seven County Regional Workforce Development Board (Ryder, Diane)

Response to Comment #1: Comment noted and will be included in the Administrative Record of the EIS.

J19. FutureGen Texas Team (Walden, Steven – Walden Consulting)

(The complete comment document submitted to DOE is shown in G10.)

- #1 | The description incorrectly states that the proposed Jewett plant site is bordered by U.S. Highway 79 (US 79). Please revise the paragraph to indicate the plant site is bordered only by Farm-to-Market (FM) Road 39.
- #2 | In Table S-3, the description indicates that the proposed Jewett injection site is located approximately 16 miles east of Fairfield in Freestone County. Please revise the description to also include the proposed injection site on the TDCJ property in Anderson County.
- #3 | In Table S-12, regarding Physiography and Soils - Up to 73 acres within the Jewett power plant site are reportedly to be disturbed for transportation corridor infrastructure construction. This is almost 5 times more than at any other site and over 40 times higher than at the Odessa site. Please provide an explanation why this site is different from the other candidate sites or revise the estimate.
- #4 | In Table S-12, regarding Biological Resources – The DEIS indicates that up to 63 miles of “high quality deer and turkey hunting ground” would be lost to utility corridor construction at the Jewett site. Please revise the description to clarify that pipeline construction is common in this area and would result in little or no long-term impact on hunting resources.
- #5 | Table S-14 includes proposed power plants that are no longer being considered. Please remove references to Big Brown 3, Tradinghouse 3 & 4, and Lake Creek 3 power plants.
- #6 | Potential Cumulative Impacts for Alternative Sites (Jewett) – The DEIS states that Texas is continuing to work on the restoration of the Trinity River. While this is true, the segments of the Trinity River near the proposed Jewett plant and sequestration sites are not currently listed as impaired for any water quality standards. Please revise the description to clarify that this portion of the Trinity River is not impaired.
- #7 | Under Table 2-3, the “Feature Heading: Sequestration site....”, the DEIS fails to identify the secondary seal provided by the Midway Group. Please correct sentences to read: “Both the Woodbine and Travis Peak formations lie beneath a primary seal, the Eagle Ford Shale, which has a thickness of 400 feet (122 meters) and shales of the Midway Group secondary seal, which has a thickness of 700 feet (215 meters).... There are also over 0.4 mile (0.6 kilometer) of low permeability carbonates and shales, including the Midway Group secondary seal, above the Eagle Ford that create additional protection for shallow drinking water aquifers.”
- #8 | The description incorrectly states that the proposed Jewett plant site is bordered by U.S. Highway 79 (US 79). Please revise the paragraph to indicate the plant site is bordered only by Farm-to-Market (FM) Road 39.
- #9 | In Table 2-3, regarding Jewett Site Descriptions – Same comments as identified in SUMMARY, Table S-3.
- #10 | Physiography and Soils – The DEIS suggests that up to 73 acres within the Jewett power plant site are reportedly to be disturbed for transportation corridor infrastructure construction. This is almost 5 times more than at any other site and over 40 times higher than at the Odessa site. Please provide an explanation why this site is different from the other candidate sites or revise the estimate.
- #11 | Table 3-7 includes proposed power plants that are no longer being considered. Please remove references to Big Brown 3, Tradinghouse 3 & 4, and Lake Creek 3 power plants.

J19. FutureGen Texas Team (Walden, Steven – Walden Consulting)

(The complete comment document submitted to DOE is shown in G10.)

- #12 **TCEQ - Potential Cumulative Impacts for Alternative Sites (Jewett)** – The characterization of the potential for new sources near the proposed Jewett power plant site implies a greater level of certainty than may actually exist. Please revise the DEIS to read, “As listed in Table 3-7, there are five coal-fueled power plants within a 50-mile (80.5-kilometer) radius of the proposed Jewett Power Plant Site in various stages of planning and permitting. In addition, the NRG Limestone Electric Generating Station plans to add a lignite-fired boiler and 800-MW electric generating unit. Based on planning data, all of these plants could begin operation before the completion of the FutureGen Project.”
- #13 **TCEQ - Potential Cumulative Impacts for Alternative Sites (Jewett)** – The DEIS suggests that a cumulative air quality impact analysis would largely be driven by the combined emissions of the proposed facilities listed in Table 3-12 (proposed coal fired power plants near Jewett). If a full impacts analysis is required, it will be pollutant specific, and the Area of Impact (AOI) will be defined from the project modeling. The emission inventory for the cumulative modeling analysis may include additional sources other than just the proposed coal fired power plant listed in Table 3-12. Please revise the description to indicate that the project modeling analysis will evaluate all sources of applicable pollutants within the AOI.
- #14 Table 3-12 includes data for proposed power plant that are no longer being considered. Please remove references to Big Brown 3, Tradinghouse 3 & 4, and Lake Creek 3 power plants.
- #15 **TCEQ - Potential Cumulative Impacts for Alternative Sites (Jewett)** – The DEIS incorrectly implies that the emissions from new sources will necessarily result in adverse air quality impacts. Permit requirements should effectively prevent adverse air quality impacts from new sources. Please revise the description to read, “Table 3-12 summarizes the air emissions estimated for these proposed power plants. Should the projects go forward, they would release tens of thousands of tons of criteria pollutants into the atmosphere.”
- #16 **TCEQ - Potential Cumulative Impacts for Alternative Sites (Jewett)** – The DEIS suggests that ambient concentrations of PM_{2.5} are much closer to the NAAQS. There is no ambient monitoring data in the Jewett area to support this statement. The Draft EIS misuses the “high ambient concentrations” taken from the urban background monitors (Houston) and states that the PM_{2.5} NAAQS would be approached at the proposed FutureGen sites. Please revise the description to read, “Cumulative air emission from proposed facilities in the region would likely cause the PM_{2.5} concentrations to increase.
- #17 **TCEQ - Potential Cumulative Impacts for Alternative Sites (Jewett)** – The DEIS incorrectly implies that the emissions from other proposed sources are expected to consume remaining PSD increments. Please revise the description to read, “While the FutureGen Project would emit pollutants, the levels would be very small, and future air quality degradation in the region would be dominated by the other proposed power plants. The State has evaluated these projects and has determined that emissions increases in the ROI would not cause or contribute to a condition of air pollution.
- #18 **TCEQ - In Table E-8 regarding Air Modeling Protocol** – The appendix lists the Jewett Land Use Characterization by season. The “winter” table is incomplete (only lists sectors 1,2,5,6 out of a total of 12 sectors). Please revise this table to include all sectors or explain the discrepancy.
- #19 **TCEQ - Air Modeling Protocol** – The DEIS lists “The nearest ambient monitors to the site and the pollutants monitored at these locations ...” and indicates that “The stations selected are in proximity to the Jewett site.” It further includes Table E-11 which “presents the representative yet conservative background for these criteria pollutants for the proposed Jewett site.” Please consider the following recommended monitoring locations as more representative alternatives for the Jewett site: Kaufman (SO₂, NO_x, O₃ and PM_{2.5}) - 80 mi.- would probably be the most representative and could replace Dallas North; Fayette County (SO₂, NO_x, O₃ and PM_{2.5}) - 100 mi - would be good second choice and probably should be used instead of Aldine; Tyler Airport (NO_x and O₃) would also be acceptable; Alabama Coushatta (O₃) - 90 mi. - but it has limited use do to the limited number of parameters measured.

J19. FutureGen Texas Team (Walden, Steven – Walden Consulting)

(The complete comment document submitted to DOE is shown in G10.)

- #20** | **TCEQ** - In Table E-11 regarding Air Modeling Protocol – The appendix lists background ambient air quality for Jewett which is not consistent with the corresponding table in Volume 2, Table 6.2-2. Please revise this information to be consistent or explain the discrepancies.
- #21** | The DEIS incorrectly cites table references. Please correct second sentence to read “Key features of the Jewett Site are listed in Table 6.1-1.”
- #22** | The DEIS incorrectly cites table and figure references. Please correct last sentence to read “Following Table 6.1-1, Figures 6.1-1, 6.1-2, and 6.1-3 illustrate...”
- #23** | Table 6.1-1, under “Feature Heading: Sequestration site....”, fails to identify the secondary seal provided by the Midway Group. Please correct sentences to read: “Both the Woodbine and Travis Peak formations lie beneath a primary seal, the Eagle Ford Shale, which has a thickness of 400 feet (122 meters) and shales of the Midway Group secondary seal, which has a thickness of 700 feet (215 meters).....There are also over 0.4 mile (0.6 kilometer) of low permeability carbonates and shales, including the Midway Group secondary seal, above the Eagle Ford that create additional protection for shallow drinking water aquifers.”
- #24** | The description incorrectly states that the proposed Jewett plant site is bordered by U.S. Highway 79 (US 79). Please revise the paragraph to indicate the plant site is bordered only by Farm-to-Market (FM) Road 39.
- #25** | In Table 6.1-1 regarding Jewett Site Features – Same comments as shown for Summary, Table S-3.
- #26** | **TCEQ** - Operational Impacts – The DEIS notes an amount of annual mercury predicted by AERMOD to be deposited and within a certain distance from the project site. However, given the units presented, this seems to be the annual ground-level concentration predicted by AERMOD. Please revise these statements to reflect “ground-level concentrations” rather than “deposition.”
- #27** | The DEIS incorrectly indicates that the average annual precipitation at the Jewett site is “about 15 inches.” Please revise the average annual precipitation to approximately 43 inches to more accurately reflect meteorological conditions in the area.
- #28** | In Table 6.3-1 regarding Seasonal Weather Data – The weather precipitation data in the table is incorrectly labeled. Please revise the table to clarify that this reflects “Average Monthly Precipitation” rather than “Precipitation.”
- #29** | Figure 6.4-1, has been constructed using only those wells that were assigned API numbers by the Railroad Commission of Texas (RCT). BEG identified an additional category of oil and gas wells in the RCT database that have location coordinates, but which have not been assigned an API number. There are 11 non API-numbered wells (shapefile name: Wells_RRC_AreaofInterest_HOB, shp) located within the 50-Year (1.7 mile) radius circles around the three Jewett Site injection wells. Hence there are a total of 46 wells within the defined ROI.

Please note that figure 6.4-1 uses the number 35 for wells within the Jewett ROI, whereas all text in the EIS uses the number 57 for wells within the Jewett ROI. In both cases, the number of wells should be 38 for the Woodbine ROI and 46 for the combined Woodbine and Travis Peak ROI. Please locate this data entry error throughout the document and correct.
- #30** | The plume radius indicated in the legend of Figure 6.4-1 is inconsistent with Section 6.4.1.1 Region of Influence, where the ROI for subsurface is defined as: Numerical modeling indicates that the plume radius associated with injecting 2.8 million tons (2.5 MMT) per year for 20 years would be 1.7 miles (2.7 kilometers)...., Please correct the legend to read: “Jewett Sequestration Site 20-Yr plume at 2.5 MMT/year (1.7 Mile radius)”

J19. FutureGen Texas Team (Walden, Steven – Walden Consulting)

(The complete comment document submitted to DOE is shown in G10.)

- #31 | Figure 6.4-2, incorrectly characterizes the Midway Group. The 700 ft (215 meter) thick Midway Group is actually all marine shale except for 10-30 foot thick sands in the top 50-100 feet. Please show that this unit should be depicted as shale in the stratigraphic column shown in Figure 6.4-2.
- #32 | Figure 6.4-2, fails to indicate that the Midway Group is a distinctly defined secondary seal or ultimate seal overlying the injection horizons and Eagle Ford primary seal. Please add blue shading on the right hand side of the figure corresponding to the Midway Group to show this as a seal.
- #33 | Figure 6.4-2 indicates that the drinking water aquifer extends down to depths of approximately 1,300 feet, which corresponds to the base of the Wilcox strata. The drinking water aquifer does not extend down in to strata of the Midway Group. Please correct this inconsistency.
- #34 | In Figure 6.4-2, under Explanation, incorrectly indicates that the information on the geologic column is mostly based on seismic profile of the Northern Injection Site. Please correct the “note” to read: “Note: Geologic column mostly based on a geophysical log of Well 42161316290000”
- #35 | The DEIS fails to identify the secondary seal provided by the Midway Group. Under the section heading: “Geological Resources in the Jewett Area,” please correct the third paragraph to read: “The primary sequestration reservoir at the site is the Woodbine formation, which is overlain by the Eagle Ford shale primary seal occurring at a depth of approximately 0.8 mile (1.3 kilometers) below the ground surface. The Woodbine is also overlain by the Midway Group secondary seal occurring at a depth of approximately 0.25 mile (0.4 kilometer) below ground surface.”
- #36 | Under section heading: “Geological Resources in the Jewett Area,” third paragraph, please correct sentence to read: “It is reported that up to 46 known wells penetrate the Eagle Ford Shale that lie within the footprint of the 20-year 2.8 million tons (2.5 MMT) per year plume (radius of 1.7 miles [2.7 kilometers]) (FG Alliance, 2006c).”
- #37 | The DEIS fails to identify the secondary seal provided by the Midway Group. Under section heading Seals, Penetrations, and Faults, subsection heading Primary Seal, please correct sentence to read: “The primary caprock seal for the Jewett Sequestration Site is the Eagle Ford Shale.”
- #38 | The DEIS incorrectly identifies the number of known wells that penetrate the primary seal. Under section heading Seals, Penetrations, and Faults, subsection heading Secondary Seals, second paragraph, please correct second sentence to read, “Thirty-eight wells that penetrate the primary seal are located within the maximum plume footprint of the two Woodbine CO₂ injection wells”
- #39 | The DEIS fails to identify the secondary seal provided by the Midway Group. Under section heading Seals, Penetrations, and Faults, subsection heading Secondary Seals, third paragraph, please add sentence to end of paragraph: “ The ultimate seal at the Jewett Sequestration Site is provided by shales of the Midway Group secondary seal, which is 700 feet (215 meters) thick and lies below the base of the freshwater aquifer.”
- #40 | The DEIS incorrectly identifies the number of known wells that penetrate the primary seal. Under section “Operational Impacts, subheading Sequestration Site,” please correct last paragraph to read: “Forty-six wells are reported to penetrate the primary seal, the Eagle Ford Shale within the 20-Yr, 2.5 MMT per year ROI.” Also, please delete the reference because number is incorrect in the FG Alliance (2006) document.
- #41 | Physiography and Soils, Transportation Corridors – The DEIS indicates that “Approximately 48 to 73 acres (19 to 30 hectares) of soil would be impacted by proposed road construction and improvements” at the Jewett site. Please provide an explanation why this site is different from the other candidate sites or revise the estimate.

J19. FutureGen Texas Team (Walden, Steven – Walden Consulting)

(The complete comment document submitted to DOE is shown in G10.)

#42 In Table 2-1 regarding Summary of Surface and Subsurface Features of Four Candidate Sites – The Surface Water Resources information incorrectly identifies the lake near the Jewett site as “Lake Limonite.” Please revise the description to correctly name the lake as Lake Limestone, rather than Lake Limonite.

Response to Comment #1: Reference to U.S. Highway 79 in Section S.4.2.3 was deleted.

Response to Comment #2: Table S-3 was revised to include the proposed injection site on TDCJ property.

Response to Comment #3: This was an error in the text. Section S.9, Table S-12 and Table 3-3 were revised as follows: “Existing railroad and road corridors are in place, therefore there would be no soil disturbance through construction of infrastructure within the power plant site.” Section 6.5.3.1, Transportation Corridors - The previous text was deleted and replaced with the following: “The proposed site consists of existing road and railroad corridors, therefore no new corridors would need to be constructed and soil would not be directly impacted.” Section 3.1.5 - The text was revised as follows: “Jewett - up to 358 acres (145 hectares) of land area for utility corridors and no soil disturbance of land area for transportation corridors.”

Response to Comment #4: Table S-12 was revised to say that up to 63 miles of high quality deer and turkey hunting ground, which is common in the area, would be “temporarily impacted during pipeline construction.”

Response to Comment #5: References to Big Brown 3, Tradinghouse 3 & 4, and Lake Creek 3 power plants were removed from Table S-14.

Response to Comment #6: While the river may not be listed as impaired by the State for this section, it is still important to acknowledge the restoration of the Trinity River on a regional scale. Furthermore, there are active stream monitoring stations upstream and downstream of the river from the proposed injection site under the Trinity River Restoration Project. The closest segment (#804 Trinity River Above Livingston) is located in a watershed where metals and fecal coliform were identified as contaminants of concern in a 2000 Texas Natural Resource Conservation Commission report (<http://www.trinityra.org/BasinPlan/Summarypdf/Executive%20Summary.pdf>). Therefore, the text will remain as presented in the EIS.

Response to Comment #7: The Midway Group, which is illustrated in Figure 6.4-2, is not specially called out as a “secondary seal” in the EIV. However, both the EIV and the EIS acknowledge the additional (secondary) protection provided by the over 0.4 mile (0.6 kilometer) of low permeability carbonates and shales above the Eagle Ford. This includes the Midway Group. Therefore, the text will remain as presented in the EIS. Comment noted and will be included in the Administrative Record of the EIS.

J19. FutureGen Texas Team (Walden, Steven – Walden Consulting)
(The complete comment document submitted to DOE is shown in G10.)

Response to Comment #8: Reference to U.S. Highway 79 in Section 2.4.3 was deleted.

Response to Comment #9: Table 2-3 was revised to include the proposed injection site on TDCJ property.

Response to Comment #10: This was an error in the text. Section S.9, Table S-12, and Table 3-3 were revised as follows: “Existing railroad and road corridors are in place, therefore there would be no soil disturbance through construction of infrastructure within the power plant site.” Section 6.5.3.1, Transportation Corridors - The previous text was deleted and replaced with the following: “The proposed site consists of existing road and railroad corridors, therefore no new corridors would need to be constructed and soil would not be directly impacted.” Section 3.1.5 - The text was revised as follows: “Jewett - up to 358 acres (145 hectares) of land area for utility corridors and no soil disturbance of land area for transportation corridors.”

Response to Comment #11: References to Big Brown 3, Tradinghouse 3 & 4, and Lake Creek 3 power plants were removed from Table 3-7.

Response to Comment #12: Section 3.3.4.2 was revised as requested, and Table 3-12 was revised to delete: “projects Big Brown, Lake Creek and Tradinghouse Units 3 and 4.”

Response to Comment #13: Text in Section 3.3.4.2 was revised from: “As new sources, these proposed facilities would be expected to consume PSD increments and may affect emission levels allowed from other new sources, including the FutureGen Project.” to “These proposed power plants (already in the permitting stage) and all other proposed sources of air pollutants would be expected to consume PSD increments and may affect emission levels allowed for projects permitted at a later time, including the FutureGen Project.”

The following sentence has been deleted: “These conditions would need to be thoroughly considered in the permitting process for the FutureGen Project and other future facilities that may be sited in the area.”

Response to Comment #14: References to Big Brown 3, Tradinghouse 3 & 4, and Lake Creek 3 power plants were removed from Table 3-12.

Response to Comment #15: Section 3.3.4.2 was revised to reflect that many of the proposed power plants have been withdrawn, and Table 3-12 was revised to delete projects Big Brown, Lake Creek and Tradinghouse Units 3 and 4. However, it is still reasonable to assume that the proposed air emissions of these large power plant projects could have an adverse impact on air quality, even if a regulatory threshold would not be exceeded and the true extent of adverse impacts is unknown.

J19. FutureGen Texas Team (Walden, Steven – Walden Consulting)

(The complete comment document submitted to DOE is shown in G10.)

Response to Comment #16: Text in Section 3.3.4.2 has been revised as follows: “Ambient concentrations of PM_{2.5} may be much closer to the NAAQS (based on the closest PM monitoring station which is located near Houston, a more urban area).”

Response to Comment #17: Paragraph in Section 3.3.4.2 has been revised as follows to reflect that many of the proposed power plants have been withdrawn: “These proposed power plants (already in the permitting stage) and all other proposed sources of air pollutants would be expected to consume PSD increments and may affect emission levels allowed for projects permitted at a later time, including the FutureGen Project.” However, it is still reasonable to assume that the proposed air emissions of these large power plant projects could have an adverse impact on air quality, even if a regulatory threshold would not be exceeded and the true extent of adverse impacts is unknown.

DOE has no information from TCEQ that would indicate that the proposed air emission sources near Jewett would not cause or contribute to air pollution. Furthermore, until FutureGen reaches the PSD permitting stage, projects with air emissions implemented before FutureGen could consume PSD increments that may affect future projects.

Response to Comment #18: Sectors 3, 4, 7, and 8 through 12 have been added to the “winter” section of Table E-8.

Response to Comment #19: The issue of representative ambient air monitoring was discussed in detail with the site proponent and DOE used information from data that were present. Since there are no actual monitoring stations within the ROI of the site, it would be making more assumptions as to the representativeness of any monitoring station that would be chosen. As part of the air permitting process, it would be more appropriate to consider monitoring at the site, if it is selected. The text will remain as presented in the EIS. Comment noted and will be included in the Administrative Record of the EIS.

Response to Comment #20: Table 6.2-2 was revised to be consistent with Table E-11.

Response to Comment #21: Table references in Section 6.1.3 were revised as requested.

Response to Comment #22: Table and figure references in Section 6.1.3 were revised as requested.

J19. FutureGen Texas Team (Walden, Steven – Walden Consulting)

(The complete comment document submitted to DOE is shown in G10.)

Response to Comment #23: The Midway Group, which is illustrated in Figure 6.4-2, is not specifically called out as a “secondary seal” in the EIV. However, both the EIV and the EIS acknowledge the additional (secondary) protection provided by the over 0.4 mile (0.6 kilometer) of low permeability carbonates and shales above the Eagle Ford. This includes the Midway Group. The text will remain as presented in the EIS. Comment noted and will be included in the Administrative Record of the EIS.

Response to Comment #24: Reference to U.S. Highway 79 was deleted from Section 6.1.3.

Response to Comment #25: Table 6.1-1 was revised to include the proposed injection site on TDCJ property.

Response to Comment #26: DOE concurs with the comment and thus Section 6.2.3.2 was revised to read “would result” rather than “would be deposited.”

Response to Comment #27: Table 6.3-1 was revised to show “seasonal” precipitation totals. The label “Average Monthly Precipitation” was changed to “Average Precipitation” and the label “Snow” was changed to “Average Snow.” Jewett Section 6.3.2.1 was revised as follows: “about 43 inches (109.2 cm).”

Response to Comment #28: Table 6.3-1 was revised to show “seasonal” precipitation totals. The label “Average Monthly Precipitation” was changed to “Average Precipitation” and the label “Snow” was changed to “Average Snow.” In addition, the corresponding tables for the Odessa, Mattoon, and Tuscola sites were similarly revised.

Response to Comment #29: The comment was discussed in a telephone conversation with the Commentor on July 24, 2007. The Commentor realizes that the estimate of wells penetrating the primary seal cited in the EIV and EIS (57) and the somewhat lower number cited along with other comments both represent best information available to DOE and to the Commentor, respectively, and that uncertainties surround both figures. The Commentor also concurs with DOE that if the Jewett Site were selected, additional site characterization studies would refine and elaborate on the estimate of the number of these wells and their locations.

The text box on Figure 6.4-1 was revised as follows: The note was deleted and replaced with: “Approximately 35 wells with API numbers are shown within the 50-year footprint. Other wells without API numbers may also exist within the plume footprint.” Additionally, text in the legend was revised as follows: “Jewett Sequestration Site 50-year plume after 2.5 MMT/year of CO₂ injected for first 20 years (1.7 mile radius).”

J19. FutureGen Texas Team (Walden, Steven – Walden Consulting)

(The complete comment document submitted to DOE is shown in G10.)

Response to Comment #30:

Comment J19-30 refers to Figure 6.4-1, not Figure 5.4-1. The text box on Figure 6.4-1 was deleted and revised as follows: “Approximately 35 wells with API numbers are shown within the 50-year footprint. Other wells without API numbers may also exist within the plume footprint.” Additionally, the text in the legend was revised as follows: “Jewett Sequestration Site 50-year plume after 2.7 tons/year (2.5 MMT) of CO₂ injected for first 20 years (1.7 mile radius).”

Response to Comment #31:

DOE believes Figure 6.4-2 reasonably illustrates the overall stratigraphy of the Jewett injection area, including the Midway Group, and that the changes recommended in the comment for characterizing the Midway Group are relatively minor. Therefore, Figure 6.4-2 will remain as shown in the EIS.

Response to Comment #32:

The Midway Group, which is illustrated in Figure 6.4-2, is not specifically called out as a “secondary seal” in the EIV. However, both the EIV and the EIS address the additional (secondary) protection provided by the over 0.4 mile (0.6 kilometer) of low permeability carbonates and shales above the Eagle Ford. This includes the Midway Group. Therefore, the figure will remain as presented in the EIS.

Response to Comment #33:

DOE acknowledges that water meeting the quality requirements for protection as a potential source of underground drinking water may not exist as deep as the Midway Group at all locations within the proposed power plant site and proposed water well field. Based on a 1991 report, the depth of drinking water (<3,000 mg/l dissolved solids) varies considerably around the proposed power plant site (between 400 and 1200 feet bgs) with deeper fresh water to the east. The current figure states “drinking water aquifer (up to 1,400 feet)”. With the caveat of “up to”, the figure is representative of conditions at and near the proposed site. See <http://www.twdb.state.tx.us/publications/reports/GroundWaterReports/GWReports/R332/Figures/Figure18.pdf>. Therefore, the text and figure will remain as presented in the EIS.

Response to Comment #34:

Note on Figure 6.4-2 was revised to read: “Note: Geologic column mostly based on a geophysical log of Well 42161316290000.”

Response to Comment #35:

The Midway Group, which is illustrated in Figure 6.4-2, is not specifically called out as a “secondary seal” in the EIV. However, both the EIV and the EIS acknowledge the additional (secondary) protection provided by the over 0.4 mile (0.6 kilometer) of low permeability carbonates and shales above the Eagle Ford. This includes the Midway Group. Therefore, the text will remain as presented in the EIS.

Response to Comment #36:

The comment was discussed in a telephone conversation with the Commentor on July 24, 2007. The Commentor realizes that the estimate of wells penetrating the primary seal cited in the EIV and EIS (57) and the somewhat lower number cited along with other comments both represent best information available to DOE and to the Commentor, respectively, and that uncertainties surround both figures. The Commentor also concurs with DOE that if the Jewett Site were selected, additional site characterization studies would refine and elaborate on the estimate of the number of these wells and their location.

J19. FutureGen Texas Team (Walden, Steven – Walden Consulting)

(The complete comment document submitted to DOE is shown in G10.)

Response to Comment #37: The Midway Group, which is illustrated in Figure 6.4-2, is not specifically called out as a “secondary seal” in the EIV. However, both the EIV and the EIS acknowledge the additional (secondary) protection provided by the over 0.4 mile (0.6 kilometer) of low permeability carbonates and shales above the Eagle Ford. This includes the Midway Group. The text will remain as presented in the EIS. Comment noted and will be included in the Administrative Record of the EIS.

Response to Comment #38: The comment was discussed in a telephone conversation with the Commentor on July 24, 2007. The Commentor realizes that the estimate of wells penetrating the primary seal cited in the EIV and EIS (i.e., 57 wells) and the 38 wells cited by the Commentor, both represent the best information available to DOE and to the Commentor, respectively, and that uncertainties surround both estimates. The Commentor also concurs with DOE that if the Jewett Site were selected, additional site characterization studies would refine and elaborate on the estimate of the number of these wells and their location. The text will remain as presented in the EIS.

Response to Comment #39: While the Midway Group shales may provide the “last” or “top” or “uppermost” seal encountered by any leaking CO₂ before the leaked CO₂ would reach drinking water supplies, DOE disagrees that the Midway Group should be given special status as the “ultimate” seal. DOE and the Alliance would be depending primarily on the Eagle Ford Shale to provide a seal at this site. Above this primary seal, there are approximately 3200 feet (maybe slightly more) of strata that contain many shale and shaly layers that each will serve as another seal. To say that the Midway Group is the ultimate seal is to convey the message that we would be relying on the shallowest strata, that strata immediately below (and containing) the underground drinking water supplies, to protect the surface environment and the drinking water supplies from any harm that could occur from a leak. This is not a true representation of DOE’s and the Alliance’s understanding of the geology at this site. The text will remain as presented in the EIS.

Response to Comment #40: Section 4.1 of the EIV states “There are numerous shallow petroleum exploration wells within five miles of the injection wells (Figure 4.2), and the projected plumes for the FutureGen injection wells would encounter 57 plugged and unplugged wells.” The number of wells within the projected plume would vary depending on where on a site an injection well might be placed, and the projected plume itself is not precise. Thus, it is not possible to obtain one precise number. To maintain consistency with the EIV and because of the uncertainties with the data as agreed upon (see Comment #38), DOE has decided to retain the number of wells at 57. The text will remain as presented in the EIS.

Response to Comment #41: The previous text under ‘Transportation Corridors’ in Section 6.5.3.1 was deleted and the following was inserted: “The proposed site consists of existing road and railroad corridors, therefore no new corridors would need to be constructed and soil would not be directly impacted.”

Response to Comment #42: In Table 2-1 in the revised Risk Assessment regarding Summary of Surface and Subsurface Features of Four Candidate Sites – The Surface Water Resources information was revised as follows: “Lake Limestone” from “Lake Limonite.”

J20. Office of the Governor – Texas (Francis, Denise S.)



OFFICE OF THE GOVERNOR

Tuesday, July 10, 2007

RICK PERRY
GOVERNOR

Mark McKoy, Document Manager
U. S. Department of Energy
3610 Collins Ferry Rd., P.O. Box 880
Morgantown, WV 26507-0880

RE: TX-R-20070530-0001-50

Draft EIS - Draft Environmental Impact Statement for FutureGen Project (DOE/EIS-0394D)

Dear Mr. McKoy:

Your application for assistance referenced above has been reviewed. The comments received are summarized below.

The Brazos Valley Council of Governments submits the following: BVCOG Board recommends approval of this project.

No other substantive comments were received.

We appreciate the opportunity to review your proposal. Please let me know if we can be of further assistance.

Sincerely,

Denise S. Francis
Denise S. Francis, State Single Point of Contact
DSF/dsi

cc: U. S. Department of Energy

#1

J20. Office of the Governor – Texas (Francis, Denise S.)

Response to Comment #1: Comment noted and will be included in the Administrative Record of the EIS.

J21. Baylor University (Lilley, John M.)



John M. Lilley
President

May 9, 2007

Mark L. McKoy
NEPA Document Manager for the FutureGen Project
National Energy Technology Laboratory
U.S. Department of Energy
P.O. Box 880
Morgantown, WV 26507-0880

RE: FutureGen Site Proposal-Heart of the Brazos, Texas

Dear Mr. McKoy:

I welcome this opportunity to reiterate Baylor University's strong support for the Heart of the Brazos FutureGen Alliance site proposal, a joint effort of the Heart of Texas and Brazos Valley Councils of Government. The geology of the Jewett, Texas, site makes it an ideal location at which to pursue the Alliance's programmatic objective of developing a technologically and economically feasible coal gasification process that harnesses the nation's abundant coal supplies to produce essential energy while at the same time protecting the environment.

The Jewett site's geographic location, in close proximity to Baylor and other research universities, also makes it especially well-suited to achieve the Alliance's goal of combining state-of-the-art production facilities with ongoing energy research and development. Alternative energy resources already are an area of emphasis within the Baylor research portfolio, in terms both of interdisciplinary faculty research and of degree program offerings. We look forward to making that existing expertise available to the FutureGen project, and to expanding our ongoing federal, state, local and university research collaborations to pursue new opportunities with Alliance partners and other FutureGen participants.

We at Baylor are very pleased to be part of the central Texas team and to endorse this Heart of the Brazos FutureGen site proposal. Do not hesitate to contact me if we can provide additional information or be helpful in other ways.

Sincerely,

A handwritten signature in black ink, appearing to read "John M. Lilley".

John M. Lilley

cc: Michael J. Mudd

OFFICE OF THE PRESIDENT
One Bear Place #97096 • Waco, Texas 76798-7096 • OFFICE: (254) 710-3555 • FAX: (254) 710-3557

J21. Baylor University (Lilley, John M.)

Response to Comment #1: Comment noted and will be included in the Administrative Record of the EIS.

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