

Ms. Cindy Mulkey, Program Administrator  
Florida Department of Environmental Protection  
Oil and Gas Program  
2600 Blair Stone Road, MS 3588  
Tallahassee, FL 32399-2600

A.A. Linero, P.E.  
Florida Department of Environmental Protection  
Oil and Gas Program  
2600 Blair Stone Road, MS 3588  
Tallahassee, FL 32399 -2600

Dear Ms. Mulkey,

We are submitting this letter of objection to ask that the Department consider denying Oil and Gas permit applications for Cholla Petroleum, Inc. numbers 1374-1379. The applications are “to drill six wells to continue its exploration for oil and natural gas in Calhoun County”. The development of the wells and pads are directly situated on a 100-year-old floodplain, which is 3 miles in each direction from two major rivers, Chipola and Apalachicola. They are also located 1 mile or less from a freshwater source that also feeds directly to one of these rivers.

The floodplains within the project areas are inundated with water especially during the summer, when rainfall is frequent. This unique type of ecosystem houses a variety of aquatic life and vegetation that are endemic to this area; making them extremely vulnerable to oil and gas drilling activities. Several of the benefits that they provide are listed below as well as the impacts that oil companies pose, which threaten the stabilization of the environment. We respectfully ask that the Department deny these permit request for the following reasons:

1. Floodplains, being mostly underwater during seasonal times, provide a marsh-like habitat that is important to several migratory waterfowl species and fish nurseries. <sup>1</sup> These fish nurseries allow adult fish to return to the river where local fishing companies can make profit from their population. With the risk of oil contamination, the fish nurseries will be adversely impacted, slowly affecting the population of certain species and negatively impact the local fishing industry.
2. The wetlands in this area have extremely beneficial soil for nutrient recycling, where in the case of an oil spill, it can become impacted and anoxic. Vegetation in these areas will not be to survive with adversely impacted soils. Oil contamination to vegetation can also occur if spillage or wastewater from activities encounter them. Contact with foliage can decrease transpiration (where CO<sub>2</sub> is taken up and the release of H<sub>2</sub>O is the product).<sup>2</sup>
3. The floodplains can act as buffers that alleviate the impact of flooding in potential nearby communities, greatly lowering the risk of flood-loss damage. Being in an environment that is



constantly inundated, this has the potential to flood oil berms and wells, which can leak oil contamination.<sup>3</sup>

4. Floodplains help filtrate various type of pollutants found in surface water before it becomes groundwater or drinking water. Oil contamination has distribution of heavy metals<sup>4</sup>, most of which cannot be filtered at water treatment facilities. Once oil has permeated the soil, it can leave traces of heavy metals in the soil for some time.
5. Floodplains which are also recognized as wetlands due to the relationship with rivers, are carbon sequestering, where the soils act as a carbon sink<sup>5</sup>. Their potential to release these gases, increases when floodplain vegetation is destroyed.

If not protected, the floodplains are endangered to losing their various benefits that not only affect wildlife but humans as well. Please consider denying these permit applications for 6 exploratory oil and gas wells in Calhoun County that are directly located on these floodplains because of the given reasons.

Thank you,

Olivia Atkins  
Earth Ethics, Inc.

Mary Gutierrez  
Executive Director  
Earth Ethics, Inc.  
Earth Action, Inc.

---

<sup>1</sup> Peter. B Bayley et al. *Understanding large river-floodplain ecosystems*. (Proquest, 1995). Vol 45, Iss. 3  
*Benefits of Healthy Floodplains*. (Nature Conservancy, 2018.) Land and Water stories.

<sup>2</sup> Reza S. Pezeshki et al. *United States Gulf of Mexico Coastal Marsh Vegetation Response and Sensitivities to Oil Spill: A Review*. (Proquest, 2015). Vol. 2, Iss. 4

<sup>3</sup> John R. Shaeffer et al. *Encouraging Wise use of flood plains with market-based incentives*. (Proquest, 2002). Vol 44, Iss. 1

<sup>4</sup> Nenibarini Zabbey et al. *Conflicts- Oil Exploration and Water*. (Proquest, 2017). Vol. 1, Iss. 5

<sup>5</sup> Virginia D. Hansen et al. *Carbon sequestration in wetlands soils of the northern Gulf of Mexico coastal region*. (Proquest, 2014). Vol. 22, Iss. 3

