

October 2, 2015

Ms. Irene Arpayoglou
Florida Department of Environmental Protection
Southeast District Office
3301 Gun Club Road
West Palm Beach, FL 33406

Mr. Levi Sciara
Florida Department of Environmental Protection
Oil and Gas Program
2600 Blair Stone Road, MS 3577
Tallahassee, Florida 32399-3760

RE: Kanter Real Estate, LLC Drilling Permit and Environmental Resource Permit Applications

Dear Ms. Arpayoglou and Mr. Sciara,

This letter is in response to Kanter Real Estate, LLC's Drilling Permit application (Application #1366) and the associated Environmental Resource Permit application (Application #06-0336409-001). As organizations working to restore and protect the Greater Everglades Ecosystem, we are strongly opposed to these applications and to all Kanter's applications for permits related to their plans to drill for oil.

The proposed drilling location lies within WCA 3 and is within the footprint of the Central Everglades Planning Project (CEPP) and near the Broward County Water Preserve Areas (BCWPA). Both CEPP and BCWPA are part of the Comprehensive Everglades Restoration Plan and are designed to improve hydrology and habitat quality in the region.

The proposed drilling will harm wetlands, may negatively impact wildlife including threatened and endangered species, and require large volumes of water. Drilling in this region is inappropriate and will interfere with restoration goals. The long history of state regulation of oil drilling in the Everglades and Big Cypress, extending back into the mid 1970's, demonstrates that a consistent policy has been to require drilling pads be located outside of significant wetlands, and downhole locations under wetlands are typically reached by directional drilling.

The permit applications note that 6.83 acres of wetlands will be impacted and the site would accommodate an unusually large 5 acre drilling pad. This pad should be compared to sites typically in use in the Big Cypress. It is unclear why this oversized drilling pad is proposed. It is clearly in excess of the size pad typically needed for drilling operations in South Florida. The large drilling pad and access to the pad are likely to negatively impact additional wetlands around the site by impeding hydrologic flows in the surrounding areas.

WCA 3 provides important habitat for many threatened and endangered species including the Everglades Snail Kite, Wood Stork and Florida Panther. Any activities that could negatively impact critical habitat or interfere with restoration efforts to improve habitat of protected species should be avoided.

Drilling efforts will also require large volumes of water. Everglades wetlands, including those in WCA 3, need additional freshwater and Broward County is already experiencing salt water intrusion in the Biscayne Aquifer. Drilling in this region would require large quantities of freshwater placing further strain on local water supplies, interfering with restoration efforts. Furthermore, drilling would put the water supply of millions of South Florida residents at risk of contamination from spills of oil and drilling fluids.

Water used in oil and gas operations cannot be recycled back into drinking water supplies. This results in a permanent loss of freshwater from drinking water aquifers. The permit applications note that wastewater generated from drilling will be stored at an onsite system, then trucked offsite for disposal. However, the ultimate location for disposal of wastewater is not mentioned.

Volume 1, Section 10.1.1 of the Environmental Resource Permit Applicant's Handbook notes that applicants must provide reasonable assurances that the "regulated activity will not adversely impact the value of functions provided to fish and wildlife and listed species by wetlands and other surface waters" and that the "regulated activity located in, on, or over wetlands or other surface waters will not be contrary to the public interest" and that "a regulated activity will not cause unacceptable cumulative impacts upon wetlands and other surface waters."

Since Kanter is proposing to drill within the footprint of Everglades restoration efforts the impacts to wetlands are likely to be cumulative and may threaten wildlife populations whose survival depends on the restoration of Everglades habitats. In addition, it is inherently not in the public interest to place the water resources of Water Conservation Area 3A at risk through the introduction of oil drilling.

Drilling within WCA 3 is incompatible with Everglades restoration efforts due to associated impacts to wetlands, wildlife and the volume of water required. Please reject Kanter Real Estate, LLC's Drilling Permit and Environmental Resource Permit applications.

*Sincerely,

Joan Bausch
Representative to the Everglades Coalition
Florida Native Plant Society

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*Signatures waived to expedite delivery

CC: Drew Bartlett, Deputy Secretary Ecosystem Restoration; Brian Accardo, Chief Advisor for
Regulatory Policy and Energy Infrastructure