

Vetting Facility Corrections

1) Although you have provided a Siting Rationale for why the production facilities are being placed where they are proposed, there is no discussion of any alternative locations further away that were considered and why those other locations were not chosen. Please revise your Siting Rationale to include this discussion.

Please see Site Rationale attachment.

2) A review of your Location Drawing indicates the nearest Public Road to a production facility is 996 feet and the nearest Property Line to a production facility is 171 feet. The distances to these cultural items in the Cultural Distance section is 1,022 feet and 156 feet. I would like to update those two distance so that they match what is shown on your Location Drawing.

Ok.

3) In the Water Resources section you did not check the box indicating whether this proposed Oil & Gas Location is in a floodplain. A review of your attachments and the Weld County floodplain maps indicates this location is not in floodplain. Therefore, I have checked the NO box.

Ok.

4) Because groundwater baseline sampling and monitoring and water well sampling is only required for Oil & Gas Locations with wells, the box in the Water Resources section listing the applicable Rule does not apply for this location. Therefore, I have changed it from Rule 318A to N/A.

Ok.

5) Your Best Management Practice (BMP) #2 indicates Extraction is currently working through the Use by Special Review (USR) application with Weld County. Now that the Weld County USR process is complete, this BMP needs to be updated to indicate the outcome of the USR application and include discussion of the neighborhood meeting and public hearings that were held as part of the Weld County USR process.

The Use by Special Review application was approved by Weld County Board of County Commissioners on June 29, 2016. Prior to the Board hearing, a neighborhood meeting was held on June 2, 2016. Building unit owners within 1000' feet of the proposed Vetting 15-H well pad and Vetting Facility and property owners within 500' of the subject property were invited to the meeting. Extraction gave a summary presentation on the proposed project and answered questions for five attendees. The Weld County Planning Commission hearing was held the following week on June 7, 2016. The Planning Commission unanimously recommended approval of the USR application by the Board of County Commissioners.

6) Your BMP #6 on Traffic Control describes the haul route agreed upon that will utilize Cherry Avenue and 24th Street. It is my understanding that Extraction is seeking approval/permission from CDOT to directly access US Business Highway 34 to the east to avoid using Cherry Avenue and 24th Street. Please

provide a status update on how that is progressing as success with this should go a long way to addressing one of the most pressing concerns with this location.

The Board of County Commissioners added a condition of approval to the Use by Special Review that states that Extraction shall attempt to obtain an access permit through CDOT for an access onto Business Highway 34. We are currently working on the CDOT access permit application. As part of the application, a Traffic Impact Study (TIS) is being completed by a professional traffic engineer for Business Highway 34. The traffic engineer is meeting with CDOT this week to discuss the requirements of the TIS and then will begin existing traffic counts. It is anticipated that the TIS will be completed in 4 to 6 weeks. Once completed, the access permit application will be submitted.

In the event the access permit cannot be obtained from CDOT the Cherry access will be used. Extraction agreed to an additional condition of approval through the USR that truck traffic will avoid school pick up and drop hours.

7) Your BMP #11 on the Leak Detection Plan states "Operator will monitor production facilities on a regular schedule to identify fluid leaks...". Please provide more specificity on what this regular schedule will be (daily, weekly, monthly, etc.).

Revised the BMP to the following:

604.c.(2)F. Leak Detention Plan: Operator will monitor production facilities daily to identify fluid leaks, including, but not limited to, visually inspecting all wellheads, tanks and fittings. Additionally annual SPCC inspections will be conducted and documented. Annual flowline testing will also occur according to COGCC rules 1101 and 1102. Inspection and record retention of flowline testing will be in accordance per COGCC regulation. All records will be made available to the COGCC upon to request.

8) Your BMP #15 on Berm Construction states "All berms will be visually checked periodically to ensure proper working condition.". Please provide more specificity on what the periodic visual inspection will be (daily, weekly, monthly, etc.).

All berms will be visually checked daily to ensure proper working condition.

9) In your June 23, 2016, email to me you indicated that Extraction commits to utilizing an oil pipeline for this location, further reducing truck traffic. As many of the Public Comments mention a concern for the anticipated volume of truck traffic, the COGCC is glad to hear about this commitment from Extraction. With that being the case, how will this reduce and/or eliminate production facilities needed for this location? Please provide me with an updated facilities list for this location based on this oil pipeline commitment. This may also require that some of the attachments be updated, the size of the disturbed area be updated, and the Cultural Distances be updated.

As stated, Extraction is committed to utilizing an oil pipeline at the Vetting facility. Use of a crude oil pipeline will significantly reduce traffic in the production phase of this project. Even with use of the oil pipeline, typical production equipment including oil tanks are necessary on location. In the event of an upset condition, the location needs to have on-site oil storage. Upset conditions could include mechanical or weather related issues at the central processing facility or what is known as a "reject oil" scenario in which the on-site LACT unit rejects the quality of the oil before accepting it into the pipeline. In this scenario we must have on-site storage on location to be able to recycle and process

the oil so that it will be accepted into the pipeline. Extraction is still in process of completing full design drawings and specifications for this facility and it is very likely that the number of tanks installed will be less than what is permitted. It is also likely that as production of these wells decreases over time that the number of tanks at this location could be reduced. However, since the engineering design is still in process, Extraction respectfully requests that the COGCC approve this facility location as currently designed.

10) To further address the health, safety, and welfare concerns of nearby residents to this Oil & Gas Location, will Extraction commit to using remote shut-off capabilities of the production facilities in case of emergency or upset conditions. If so, please provide me a BMP that addresses this.

Please add the following BMP:

Operational system will be automated to allow remote shut in, remote monitoring, and off-site response to emergencies.

11) Now that the Public Comment period has ended, please provide me with a letter certifying compliance with COGCC Rule 306.e. Please also include in the letter a discussion of the consultations

Alyssa will provide this as soon as we hear back from the last BUO that requested a consultation. The BUO has been out of town on vacation.