

Public Comments

The following comments were provided by members of the public and were considered during the technical review of this application.

No. Comment

Comment Date

1

12/30/2015

TO:John Noto, COGCC Oil and Gas Location Assessment Supervisor

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Rebecca Treitz, COGCC OGLA Assessment Specialist

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FR:Matt Sura, Attorney at Law

DT:12/30/2015

RE:Comment on Form 2A # 400947039, Dittmer KE Pad, located in the NENW Sec 32, Twp 1N Rng 66W

Dear COGCC,

These comments are submitted on behalf of the City of Brighton regarding Great Western's proposed Dittmer KE Pad and all the associated wells.First of all, the City of Brighton appreciates that Great Western has chosen a location that appears to be at least 1,000 feet from homes. The City of Brighton's concerns about this location are primarily about access to and from the proposed location. The access route indicated on the "Access Road Map" would require traveling west on County Road 4 (New Energy Drive) then turning south on US Hwy 85.That is a prohibited turn.Furthermore, the proposed access onto County Road 4 is within the City of Brighton and therefore a right of way application will need to be filed with the City.

The City of Brighton is requesting that a full transportation plan be filed with the City of Brighton prior to this location being permitted by the COGCC.Brighton has reached out to Great Western to discuss its transportation concerns but, due to the holidays, we have been unable to meet with the appropriate Great Western staff.

COMMENTS

The proposal will create a large impact to transportation infrastructure.

Constructing the location and drilling, completing, and servicing the wells will create a large impact on local transportation infrastructure.Great Western has proposed 25 wells, 36 oil tanks, 6 water tanks, 2 modular large volume tanks, 30 separators and 4 vapor recovery units.The proposed location will be, by any standard, a very large oil and gas facility.

Drilling and hydraulically fracturing a single well takes a minimum of 14 days per well.Even using that conservative estimate, drilling and completing 25 wells will take approximately one year.

During that year, there will be at least 36,000 one-way truck trips (18,000 inbound and 18,000 outbound) to the facility – primarily for hauling water for drilling and hydraulic fracturing, and disposing of flow-back wastewater.

Brighton estimates that current traffic volumes on County Road 4 east of Main Street is about 1,500 vehicles per day.Approximately 10% or 150 of those trips are truck traffic.The proposed facility would add 100 additional trucks on that stretch of road each day, on average.

This additional truck traffic could damage County Road 4.The load impact of oil and gas trucks can be as much as 6,000 to 30,000 times that of a passenger car.

Great Western's proposed haul route is illegal.

The haul route proposed by Great Western appears to require a left turn from westbound County Road 4 to US Hwy 85. That is a prohibited turn. The intersection was converted to a ¾ movement and

does not have a lane to turn from as that lane was replaced with an island.

The alternate transportation routes to reach US Hwy 85 all travel through City of Brighton roadways. The intersections for both County Road 6 and Baseline road on Main Street are at capacity and not designed for heavy truck traffic. The intersection of County Road 4 and Main Street does not have sufficient turn radiuses to function well for increased truck traffic. (See Figure 1)

The City of Brighton would like to discuss alternative travel routes to and from this location with Great Western.

The proposed oil and gas access road will require a Right of Way Permit from the City of Brighton.

County Road 4 (New Energy Dr.) is within the City of Brighton. The proposed access to County Road 4 will require obtaining a right of way permit from the City of Brighton.

The new road to access the well pad is proposed slightly offset from the southern entrance to the Vestas plant (E. Crown Prince Blvd.). The City of Brighton is requesting a traffic study that considers the movements and interactions with existing traffic at that intersection and along the proposed haul route.

In conclusion, the City of Brighton's Street and Fleet Department would like to meet with Great Western to discuss its transportation concerns: 1) a right of way permit for accessing County Road 4, 2) the location of the proposed road to access the pad, 3) haul routes to and from the location, and 4) completion of a traffic study.

The City of Brighton requests that these issues be addressed prior to COGCC issuing a permit for this location.

Sincerely,

Matt Sura

Figure 1 – Weld County Assessor map highlighting the proposed location of the well pad.

Figure 2 – Google Map with an approximate location of well pad and access road

Total: 1 comment(s)