

## 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

01/06/2017

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

Email: john.noto@state.co.us

Melissa Housey - Southeast Location Specialist

Email:melissa.housey@state.co.us

FR:Matt Sura, Attorney at Law

DT:1/06/2017

RE:Comment on Form 2A # 401128265, Ottesen LE Pad and Form 2A # 401128290 Ottesen Off-Site Tank Battery, proposed in located in the NWSE Sec 33, Twp 1N Rng 66W

Dear COGCC,

These comments are submitted on behalf of the City of Brighton regarding Great Western's Ottesen LE Pad and Ottesen Off-Site Tank Battery that are proposed just outside of the City of Brighton.

We would like to thank Great Western for meeting with City of Brighton twice in the past two months about this proposal.Great Western's staff has been very willing to listen to all of Brighton's questions about this location and their application to the COGCC, and, generally, have been receptive to addressing those concerns.The City of Brighton encourages all operators to take the time and care Great Western has shown in choosing an appropriate location and in coordinating with nearby local governments.

The City of Brighton is generally in support of this location because it is farther than 1,000 feet from homes and is outside its public water supply area.However, the City of Brighton still has concerns about the Great Western proposal and submits the following comments: 1) Great Western should commit to pipelines to bring water to the location, 2) the proposed truck traffic route should be changed and 3) Great Western should comply with Rule 609 water quality monitoring.

1) Great Western should commit to pipelines to bring water to the location

The COGCC should place conditions of approval on the Ottensen LE Pad Form 2A permit that would require the use of water pipelines rather than trucking water to the location for completion operations.As is the case for all horizontally-drilled hydraulically fractured oil and gas development, the majority of the truck traffic can be eliminated through the use of pipelines to carry water for hydraulic fracturing.Brighton would prefer water pipelines to be required for the location but would support a condition of approval that states, "Great Western will use "best efforts" to utilize pipelines to carry water to the site for completion operations."Great Western staff confirmed today that they would support this language as a condition of approval.

2) The proposed truck traffic route should be changed

Great Western's proposed truck traffic route, as described in its access road map (Doc #401136789), would allow oil and gas traffic to go south on CR 31 then west on County Road 2. This proposed route will bring a significant increase in traffic by several Brighton neighborhoods.A better, less impactful route for Brighton residents would be to send traffic north on County Road 31 and then west on County Road 4 (New Energy Drive).The City of Brighton appreciates that Great Western has verbally committed to make this change. Great Western has stated that it will amend its application with the new access route.If not, Brighton would like to see that requirement listed as a condition of approval in this permit.

Great Western's existing Dittmer pad is also utilizing County Road 4.The City of Brighton will continue to work with Great Western to ensure that Brighton will be adequately compensated for any road damage attributable to Great Western's oil field traffic.

3) Great Western should comply with Rule 609 water quality monitoring

This location is within the Greater Wattenberg Area and therefore is exempted from Rule 609 water quality monitoring regulations. Given the extraordinary number of wells that are proposed for this location, and the fact that Brighton residents in the nearby Jacobs Run neighborhood utilize wells as their primary domestic water source, the City of Brighton requests that the COGCC require this location to follow Rule 609, rather than the less-thorough Rule 318A.f. water quality monitoring regulations.

City of Brighton residents in Jacobs Run have voiced a lot of concern to the City of Brighton over protection of their water quality. Those concerns would be best addressed through compliance with 609 regulations rather than dozens of landowners requesting the COGCC conduct water quality monitoring on an ad-hoc basis.

In conclusion, the City of Brighton commends Great Western for its outreach to Brighton and for securing a responsible drilling location that is more than 1,000 feet from homes and outside the City's public water supply area. Brighton requests that the permit be amended to 1) commit to using pipelines to bring water to the location, 2) reroute truck traffic to the north, and 3) comply with Rule 609 water quality monitoring regulations. The City of Brighton requests that these issues be addressed prior to COGCC issuing a permit for this location.

Sincerely,

Matt Sura

For City of Brighton

Total: 1 comment(s)