

## Public Comments

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

<u>No.</u>	<u>Comment</u>	<u>Comment Date</u>
1	<p>TO:John Noto, COGCC Oil and Gas Location Assessment Supervisor</p> <p>Email: john.noto@state.co.us</p> <p>Doug Andrews, COGCC OGLA Northeast Location Specialist</p> <p>Email: doug.andrews@state.co.us</p> <p>FR:The Sierra Club</p> <p>DT:June 24, 2016</p> <p>RE: Comment on Extraction Oil Gas LLC's Form 2 Applications Nos.400939043 (Vetting 15); 400939070 (Vetting 16);</p> <p>400939077 (Vetting 17); 400939089 (Vetting 18); 400939099 (Vetting 19); 400939106 (Vetting 20); 400939113 (Vetting 21); 400939179 (Vetting 22); 400939184 (Vetting 23); 400939199 (Vetting 24); 400939206 (Vetting 14); 401053268 (Vetting 12); 401010054 (Vetting 13); 400939287 (VT-Alles 1-16-18); 400939355 (VT-LDS 4-16-18); 400939380 (VT-Glenmere 3-16-18); 400939394 (VT-Glenmere C1-16-18);400939399 (VT-LDS 1-16-18); 400939404 (VT-LDS 2-16-18); 400939407 (VT-LDS 3-16-18); 400939411 (VT-LDS C2-16-18); 400939415 (VT-LDS C3-16-18);400939366 (VT-LDS C4-16-18); 400939362 (VT-LDS 5-16-18).</p> <p>Dear Colorado Oil and Gas Conservation Commission:</p> <p>These comments pertain to each of the above-referenced Form 2 applications. We are addressing these 24 applications together because they are related, and filing them in duplicate so they will be in the record for each application.</p> <p>On June 22, the Sierra Club, along with other groups, filed comments in opposition to Extraction OG LLC's Form 2A applications for these 24 wells and associated production facilities.We hereby incorporate those comments and exhibits by reference in this submission in opposition to the 24 applications for a permit to drill.The COGCC is already in possession of two hard copies of our comments and two CDs containing the exhibits, but we have also made them available at <a href="https://www.dropbox.com/sh/gnpfrhh5ox52cqz/AABt0xZBUQmWglESiaN-cr6Ba?dl=0">https://www.dropbox.com/sh/gnpfrhh5ox52cqz/AABt0xZBUQmWglESiaN-cr6Ba?dl=0</a>.</p> <p>In addition, one of the flaws in the Form 2A location assessment applications is the lack of any analysis of alternative sites.We believe Extraction OG is capable of such an analysis and should be required to perform one.For example, attached hereto as Exhibit 4 is an alternative analysis they did for another project.This should be required here as well.</p> <p>For the reasons detailed in our previous comments and above, we urge you to deny these 24 permits to drill.</p> <p>Sincerely,</p> <p>Eric E. Huber</p> <p>Managing Attorney, Sierra Club</p>	06/24/2016
2	<p>Bella Well COGCC Public Comment</p> <p>To:COGCC. Governor Hickenlooper</p> <p>Today I spent the better part of the morning and afternoon listening to and giving a short testimony about the 24 Bella Romero Wells and corresponding facility site.</p>	06/29/2016

The Applicant, Extraction Oil and Gas gave a lengthy presentation citing a number of items they were proud of to the Weld BOCC and the audience.

Then there was a Public Comment Session and then a Rebuttal period with the Extractions representative.

Since there wasn't an opportunity for the Public to comment a second time, as the Industry was able to do in response to public comment, in a rebuttal format, I will put my comments here. During this question and answer period between extraction and the BOCC the community voice was entirely and clearly missing. During this hearing there needed to be a balance in questioning from the audience to make up for the one sided questioning and the lack of good questioning from the Weld Board of Commissioners in their question and answer period with Extraction. There were many lies, mistruths, misleading statements and evasions in the answers provided by Extraction during the rebuttal period.

Below are just a few of the problems with the answers given by Extraction, and the methodology used to determine an outcome used by the Weld BOCC who approved these 24 wells and the facility site at the hearing:

1. Why aren't the Weld BOCC and Extraction waiting for the Pipeline to be approved and built before the applications are approved? What is the hurry? The way Extraction has stated their policy about the pipeline leaves too many doors open. By leaving their commitment to a pipeline vague they allow the possibility of subjecting the residents- if the pipeline 'falls through' and the school, to dramatically increased semi- truck traffic, to a facility site that would be 20+ acres in size which would create a visual blight and to the logarithmic increase in air pollution that would be emitted in the neighborhood and near the school. Be patient and wait to see what happens with the pipeline before permitting this site – the facility site absolutely doesn't belong in the neighborhood or near a school.

2. The Extraction Representative talked a lot about recovery of the emissions saying that they are able to recover 98% of VOC's and methane. It was unclear during his presentation which by- products from the drilling completion and production phases he was referring to. Those by- products and their chemical makeup need to be explicitly listed, as the remaining 2% emissions will be in the neighborhood and on the school site over a period of 30 years. With a much needed weather pattern study with data collected about inversions in the area – Extraction should have to prove 100% air safety for nearby citizens within 1 mile of this project. The amounts of VOC's and methane should be stated in an actual amount – in tons- then reported to the community, the BOCC and the COGCC and documented in the application. Then there would be a clearly stated range of pollutants and their chemical make up for the people to know will be coming their way during the 30 years that this site exists. 2% of billions of barrels oil productions emissions into the air near these homes and Bella Academy school and playground/soccer field over a 30 year period ~is many millions of tons of pollutants emitted into the neighborhood. This is no small amount of VOC's and since Extraction did not report this number and stayed vague, this important piece of information should be calculated as a required detail of the application.

3. Though Extraction may or may not currently be in contact with Xcel about the Electrical Drilling Unit, Extraction has promised the School Board and Residents of Bella Romero to use electricity during the drilling phase. It was unclear if using the electricity during the drilling phase actually reduced the decibels but the BOCC wanted to believe that it did. There was resident concern about the possibility that Xcel may not be able to provide the area with the amount of electricity needed to drill. Therefore since Xcel has not yet approved this access to, and use of, electricity on the grid that exists in Bella Roma, the applications are permitted on an assumption before so if the use of the electrical grid falls through, Extraction left the door open to use diesel for the drilling. Therefore the applications are incomplete. The Weld BOCC's decision to approve the 24 wells prior to a contact with Xcel is equivalent to making a promise on a house of cards for the residents and school community of Bella Romero. It is putting the cart before the horse to approve these wells prior to a contract for this site with Xcel. Some neighbors expressed distress about electrical outages that already occur in the neighborhood about once a month. The BOCC members did not fully address this issue. The prudent thing to do would be to assure, with a contract, the use on the electrical grid with Xcel, before any permitting thereby assuring the use of the electrical drilling phase. Extraction was then forced to admit that the completion phase uses generators and diesel. Not being clear at all about the decibels for this phase. Extraction should be required to address and state the facts on the application before it is approved.

4. It was stated a number of times during the presentations that a requirement for this site is the completion of a CDOT traffic study and a completed CDPHE study. Neither of these have been initiated by Extraction let alone completed: with results, recommendations and presentations of the results to concerned parties. It is likely that the Weld BOCC must think they already know the outcome

of these 2 studies, but in reality they do not. I suggest that both of these studies are initiated and completed and presented to the Weld BOCC, the COGCC, Extraction and the Community BEFORE any kind of green light is given for these wells. Again, the Weld BOCC is putting the cart before the horse approving the USR for these 24 wells and having patience with permitting is the prudent thing to do. 24 wells will absolutely have a significant impact on the Bella Romero residents, their air, their traffic and the school and walking traffic. Approval of this site without first waiting for results of the 2 studies is negligent.

5. Another cart before the horse. The request to use US34 has not been approved by CDOT. If they don't approve it, but the wells are already permitted, then Extraction will just go ahead and use all of the original roads that has citizens so concerned. Again, be patient, wait for CDOT to approve or not approve Highway 34 and see how the CDOT traffic study turns out. Cherry Street is doomed as neighbors have already expressed if the wells are approved and US34 doesn't get approved. Don't leave this open to chance! Wait!

6. During the final moments of the BOCC discussion about the Items in the application they removed a significant line item and replaced it with another nebulous statement. It now reads (paraphrased) that 'within an hour of the beginning of school and the ending of school' there will not be any heavy traffic (though pickups and regular traffic will still be allowed). It does NOT

say what will happen to the semi-truck traffic related to this project during these 4 hours daily M-F. I guarantee that communicating with the hundreds of truckers about this detail will be messy, if not impossible, and that there are no restrictions in the Line Items saying that the semi truck drivers will not be allowed to use the Cherry Road Access (or any other access) during those 4 hours daily. The Weld BOCC removed the protections that existed for road use written prior to the change to the school hour restriction statement. Also, there is no way that those truckers are going to stop their work during these 4 hours every day, rather they are on a tight time schedule and will get to the job site, no matter what it takes. This means the traffic will move into neighborhoods and onto Cherry Street. Again, add the original statement back into the current time frame statement as a backup plan. For protection residents from the 100,000 + of semi-truck onslaught associated with this size of operation add that statement back into the line items WITH the time restriction.

7. The BOCC, particularly Ms. Kirkmeyer and Mr. Conway were in a punishing mood to the School Board. They went on to say (paraphrased) that 'too bad you didn't get sidewalks when you had a chance in 2009'! It was said in a punishing, condescending manner and very disrespectful to the whole of the community sitting in the audience. Mr. Conway offered the sidewalk 'conditions' back to the School Board but there wasn't an acknowledgement or apology about the degrading manner that was expressed by the BOCC to the District 6 school board

8. A bus load of paid oil and gas workers entered the meeting and sat in the back. In essence they became the political pawns of the Weld BOCC for the Hearing. They were used by the BOCC to show how the Oil and Gas industry is vital to the economy of Weld when in fact it isn't. Job training could be made available for these men – in other industries and technological vocations. Do you see Blacksmiths around in our society? We need to move beyond the increasingly archaic oil and gas industry. By keeping these workers suppressed and dependent on a boom and bust vocation, we are not helping them, or our economy at all.

9. It is my recommendation that this well and the other 23 wells in this 2A and the associated Industrial Facility site not be approved by the COGCC. The distance between the edges of the school soccer field and the edges of the Industrial Site are too narrow. The siting photos show a very close proximity to trailers and other low income housing. Many people from this neighborhood felt that it was too hopeless to come and express their concerns about their neighborhood being industrialized. Which of course it was. The COGCC needs to use discretion in this case on behalf of the underrepresented citizens in this neighborhood and all of the school children and their parents who do not even know about what is headed their way....450 + days of 24/7 Industrial activity!

10. The Weld BOCC is knowingly putting this community and school in harm's way. Though they received documents and studies during the public comment period today – they had lunch at Rio and did not have time to read these documents, which included health studies, before making their determination of approval for this site. Therefore instead of being curious and wanting to find out what was actually being said in the thick packet of documents and delaying a decision until they had more information – particularly health information - they did a cursory and haphazard review of the doc's and called it good – this is negligence and intent to cause harm by remaining ignorant on purpo