

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>Ward Petroleum Corp.'s ("Ward's") proposed Edmundson 30 location (COGCC Doc. No. 401290161) is located in Township 1 South, Range 66 West, Section 30: SE/4SE/4. THF Prarie Center . ("THF") owns surface land located in Township 1 South, Range 66 West, Section 29, including the entire W/2, which will be imminently developed.</p> <p>As proposed, the Edmundson 30 location is 389 feet from THF's property line. In addition to Adams County's previously-stated concerns regarding visual, sound, and dust impacts associated with the proposed location, THF is concerned with traffic, odor, safety, and health impacts, and the effects the foregoing will have on the value of THF's property and the livelihoods of those who purchase the developed property.</p> <p>THF requests that the Director require the proposed Edmundson 30 location to be as far as possible from existing building units and THF's property, which is subject to imminent development. THF further requests that the Director require Ward to use the best available technology and best management practices to avoid, or in the alternative, minimize the impacts its proposed location will have on THF's adjacent surface land and imminent development.</p>	06/22/2017
2	<p>CPW has one main concern and subsequent recommendations for the operator:</p> <p>1) Avoid Third Creek and any riparian areas. If work will occur from February 1 through July 15, then CPW recommends a raptor nest survey (prior to commencement of oil and gas operations) for any potential suitable nesting habitat (bluffs, large trees, etc.) within 1/2 mile of the proposed activity.</p> <p>Should the operator have any further questions or need species-specific survey protocol, please contact CPWs NE Region Energy Liaison (Brandon Marett) at (303) 291-7327.</p>	06/26/2017
3	<p>TO:John Noto, COGCC Oil and Gas Location Assessment Supervisor</p> <p>Email: john.noto@state.co.us</p> <p>Melissa Housey, COGCC OGLA Assessment Specialist</p> <p>Email:melissa.housey@state.co.us</p> <p>FR:Matt Sura, Attorney at Law</p> <p>DT:6/26/2017</p> <p>RE:Comment on Form 2A # 401290161, Ward Petroleum Edmunson 30 Pad, located in the SESE Sec 30, Twp 1S Rng 66W</p> <p>Dear COGCC,</p> <p>These comments are submitted on behalf of the City of Brighton regarding the Ward Petroleum Edmunson Pad and its 24 associated wells. Brighton has concerns about the location.It is in a designated floodplain and within the Brighton Public Water System protection area.Brighton also has concerns about the transportation route proposed by Ward.</p> <p>COMMENTS</p> <p>1)LOCATION</p> <p>While Brighton appreciates that Ward has chosen a location that is at least 1,000 feet from the closest</p>	06/26/2017

home, this location is not ideally-suited to oil and gas development. According to the location drawing (Doc. # 401294994), the proposed pad is less than 200 feet outside of the city limits of Brighton and within its Growth Management Area. The location is also within a designated floodplain. In Brighton's recent update to its Comprehensive Plan, Ward's proposed location is designated as a future "mixed use" area and recommends that the floodplain area should be left "open and free of development".

The Edmunson pad is within one mile of THREE other pads: the Ward Brighton Lakes pad, the PetroShares Brighton Lakes Pad and the HRM Resources PC Pad (see attached map). Adams County and the City of Brighton are struggling to plan for current and future growth. It is clear that consolidation of these pads would help to minimize the impacts to Brighton and Adams County.

2) WATER QUALITY PROTECTION

The proposed Edmunson location is also located within the Brighton Public Water System protection area (PWS) which received enhanced protection through COGCC Order No. 1-189. The location appears to be within the Groundwater Sampling Zone and within the BMP Buffer Zone designated in the PWS Order. Accordingly, the City of Brighton requests that the requirements of the Order be followed - requiring enhanced ground water testing and following best management practices to protect public water supplies. Specifically, Brighton requests that Ward stipulate on page 5 of the Form 2A application that it will follow COGCC's Order No. 1-189 ground water monitoring requirements. Ward should also commit to all best management practices in the PWS Order No. 1-189 in its application.

3) TRANSPORTATION

Brighton appreciates that Ward has agreed to connect to the Discovery oil pipeline. This will eliminate a lot of heavy truck traffic for the life of the wells. Brighton encourages Ward to also commit to piping water for hydraulic fracturing to the location which will also eliminate a majority of the truck traffic during drilling and completion operations.

Ward submitted an Access Road Map (Doc. # 401295017) with its application that proposes a new road that will run north from the Edmunson location to 132nd Ave. Given that the location is within the Brighton Growth Management Area, Brighton requests that the road be built to Brighton specifications as a condition of approval on the permit. These requirements include:

a) The Operator agrees to construct (unless already constructed) and maintain an access road designed to support an imposed load of 75,000 pounds (or the load of the heaviest truck anticipated, whichever is greater), that will accommodate emergency response vehicles such as, but not limited to, law enforcement, emergency command vehicles (cars/SUVs), ambulances, hazardous materials response vehicles, water tenders, and fire apparatus during construction and operation of new tank batteries, new drilling activity and reworks or recompletions of existing wells that require a new Form 2 or 2A permit, unless a local fire department or fire district agrees to a different or lesser standard or waived by the City.

b) With respect to new roads to new tank batteries, the Operator agrees to construct access roads at least sixteen (16') feet wide graded gravel roadway with a prepared subgrade and an aggregate base course surface a minimum of six inches thick compacted to a minimum density of ninety-five percent of the maximum density determined in accordance with generally accepted engineering sampling and testing procedures. The aggregate material, at a minimum, shall meet the requirements for Class 3, Aggregate Base Course, as specified for aggregate base course materials in the Colorado Department of Transportation Standard Specifications for Road and Bridge Construction, latest edition.

c) Graded so as to provide drainage from the roadway surface and constructed to allow for cross drainage of waterways (such as roadside swales, gulches, rivers, creeks, and the like) by means of an adequate culvert pipe. Adequacy of the pipe is subject to approval of the Director of the Department of Streets and Fleet.

d) Maintained so as to provide a passable roadway reasonably free of ruts at all times.

e) Water Management. Water necessary for drilling and hydraulic fracturing shall be piped to the location if reasonably and commercially practicable. The availability and use of City water shall be at the sole discretion of the City.

f) Chains. Traction chains from heavy equipment shall be removed before entering a City street or right-of-way.

g)Mud Tracking. The Operator shall take all practicable measures to ensure that vehicles do not track mud or debris onto City streets and rights-of-way. If mud or debris is nonetheless deposited on City streets, in excess of de minimus levels, the streets shall be cleaned as soon as practicable by the Operator. If for some reason this cannot be done, or needs to be postponed, the City shall be notified of the Operators plan for mud removal.

The access road map appears to be at least 20 years old.It omits E-470 that runs within 500 feet of the location.A more current map would be helpful in this case.

Ward also proposes an impossible route from 132nd Ave. to Highway 85.132nd Ave. does not connect to Highway 85 but ends at the railroad track on the east side of Highway 85.Brighton encourages Ward to meet with the City of Brighton and Adams County to propose a route that is acceptable to the affected local governments.

4)OPERATOR MEETING WITH LOCAL GOVERNMENTS

Brighton had not received advanced notice of the location from Ward even though City staff have had several meetings with Ward representatives in the past three months.Brighton encourages Ward to follow the letter and the spirit of COGCC 302.c that encourages operators to meet with municipalities to discuss their future plans to drill within the municipality. In this case, the well bores are within the city limits of Brighton.Ward is also obligated to offer to meet with the City of Brighton pursuant to Adams County's oil and gas regulations.The Brighton City staff looks forward to meeting with Ward about this project in the near future.

Sincerely,

Matt Sura

Total: 3 comment(s)