

Public Comment Consideration Memo – Verdad Resources, LLC

Safi 1224 Location Form 2A Oil and Gas Location Assessment - Doc# 402010466

Safi 1224-01H Application for Permit to Drill (APD) – Doc# 402009320

Safi 1224-02H Application for Permit to Drill (APD) – Doc# 402009277

Safi 1224-03H Application for Permit to Drill (APD) – Doc# 402009336

Safi 1224-04H Application for Permit to Drill (APD) – Doc# 402009351

Safi 1224-05H Application for Permit to Drill (APD) – Doc# 402009375

Safi 1224-06H Application for Permit to Drill (APD) – Doc# 402009419

Safi 1224-07H Application for Permit to Drill (APD) – Doc# 402009428

Safi 1224-08H Application for Permit to Drill (APD) – Doc# 402009449

Safi 1224-09H Application for Permit to Drill (APD) – Doc# 402009465

Safi 1224-10H Application for Permit to Drill (APD) – Doc# 402009488

Safi 1224-11H Application for Permit to Drill (APD) – Doc# 402009505

Safi 1224-12H Application for Permit to Drill (APD) – Doc# 402009511

Safi 1224-13H Application for Permit to Drill (APD) – Doc# 402009519

Safi 1224-14H Application for Permit to Drill (APD) – Doc# 402009527

Ten public comments were received on the Safi 1224, Form 2A Oil and Gas Location Assessment Doc# 402010466, between 6/18/2019 - 6/22-2019. The comments expressed general concerns about desiring a halt in permitting until SB19-181 rulemaking, general regional air quality concerns, general concerns about freshwater resources appropriation due to oil and gas activities, and one comment contained miscellaneous general comments about other oil and gas impacts. Three public comments were received on the majority of the Applications for Permits to Drill (APDs) between 6/18/2019 – 6/19/2019. All three comments expressed general concerns about regional air quality. Two of the comments also expressed the desire for a halt in oil and gas permitting until SB19-181 rulemaking.

COGCC Response:

Halt in Permitting Until SB19-181 Rulemaking – Per SB19-181, on May 16, 2019, the Director of the Colorado Oil and Gas Conservation Commission (COGCC) established 16 Objective Criteria with which potential oil and gas locations are to be evaluated against with increased scrutiny until rulemaking occurs. SB19-181 did not contain language mandating or encouraging a halt to the permitting process during the rulemaking process.

Regional Air Quality – The Form 2A describes emissions mitigation measures that will be in place including: the use of Vapor Recovery Units, the use of Emissions Control Devices, daily audio, visual, and olfactory inspections, green completions, and the use of MLVTs to reduce vehicle trips.

Freshwater Resources – Water acquisition for hydraulic fracturing is not regulated by the COGCC. The use of water during hydraulic fracturing is regulated under COGCC rules.

Other - The locations of future oil and gas drill locations are regulated under COGCC rules. Statutory pooling of private oil and gas resources is regulated under COGCC rules. The Safi 1224 location is located more than 5,280 feet away from any schools. Weld County public road usage and maintenance

is overseen by Weld County. Remediation of spills is regulated under COGCC rules. Industry influence on local and state governments is outside of COGCC jurisdiction.