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To Chris Simmons

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Submitted by Jennifer Gamble, President, Adams County Communities for Drilling Accountability NOW and resident of Adams County, 2280 E. 138th Avenue, Brighton, CO 80602

Comments on Todd Creek Request for Use by Special Review Permit Application for twelve horizontal wells on one well pad for the production of oil and gas

14995 Riverdale Road, Brighton

Parcel #: 0147114000028

- 1) We strongly encourage Adams County to use its Special Use Permit process for all large oil and gas developments near neighborhoods (Urban Mitigation Areas) rather than the truncated AUSR process. We prefer the Special Use Permit process because it provides greater opportunity for public hearing/engagement in the process. It also states the following standards for approval which we feel are extremely important for sites proximate to neighborhoods or located within neighborhoods:
 - a. The Special Use Permit Process requires a hearing before the County Board of Adjudication and a subsequent finding by the board that the proposed use (among other things) is: ***“3. The special use is compatible with the surrounding area, harmonious with the character of the neighborhood, not detrimental to the immediate area, not detrimental to the future development of the area, and not detrimental to the health, safety, or welfare of the inhabitants of the area and the County.”***
 - b. The Special Use Permit process also requires the consideration for offsite impacts and planning for things like traffic flow, fire protection, etc.
- 2) We strongly encourage Adams County to make the permit applications more readily available for public review by placing a visible button link on its Oil and Gas page that says OIL AND GAS PERMIT APPLICATIONS AVAILABLE FOR PUBLIC COMMENT and then when you click the link there are all the packages that are out for comment and the comment period start and end dates clearly specified with a link the public can click to submit a comment on that permit. In keeping with Adams County principle of “transparency,” we encourage Adams County to post the entire permit application from each applicant to its website on or prior to the first day of the public comment period.
- 3) We strongly encourage Adams County to require the following as Best Management Practices for all large-scale oil and gas development near neighborhoods or in UMAs in Adams County. At a minimum, we encourage Adams County to include the following Best Management Practices for the Todd Creek well drilling at 14995 Riverdale Road, Brighton, Parcel #: 0147114000028, as well as including these a **“Minimum Standard for Best Management Practices”** for all large-scale multi-well facilities to be located **proximate to neighborhoods or in a UMA.**

- a. Required use of electric drill rigs or best available clean and quiet drilling technology to achieve noise levels of LESS than 45 dBA (measured at 200 feet from the drill rig) for drilling proximate to neighborhoods or in a UMA
- b. Required use of a closed loop systems
- c. Required piping in of water (no use of local wells)
- d. Requirement for use of low-profile tanks (12-foot tall maximum during both drilling and for long-term operations)
- e. Required pipeline in place prior to commencement of drilling for piping out of oil and gas product to minimize traffic
- f. Required steel-rimmed berms and synthetic liners everywhere and in all cases
- g. Require berm capacity capable of containing 1.5 times the amount of liquids to be present on the site at any given time
- h. Prohibit any and all use of pits
- i. Require increased liability insurance for operators at a minimum of \$5 million per incident to cover the increased risk of drilling in or near neighborhoods.
- j. Require a maximum equipment height for any equipment to remain on the site for operations (such as VCUs, shafts, etc.) of 25 feet or less (Note this is in addition to the height restriction of 12 feet for all product storage tanks to be used at the site).
- k. Requirement for no flaring except in the case of an emergency
- l. Strengthened requirements for dust control during operations, requiring that “no visible dust” is created on roads or drilling and operational activities
- m. Required all permanent equipment needed for operations to be powered by electricity from the grid
- n. Restrictions on well drilling traffic for safety considerations and to avoid school schedule times and evening times when people are trying to sleep
- o. Requirement that once drilling starts on the first well that all planned wells must be completed within 9 months or they lose the right to drill and must repeat the permit process for remaining wells.
- p. Requirement that upon completion and for operations the well site equipment and infrastructure area must be surrounded by a fence that provides a solid visual barrier with a height tall enough to shield all well equipment from view.
- q. Requirement that the entire site be fenced with a 6-foot security fence and a locked gate capable of keeping children from entering the property.
- r. Requirement for a vegetated berm (6 feet tall) and landscaping to match the surrounding community, including mature (8 foot tall) trees planted three rows deep around the entire equipment area but at a safe distance from the equipment to not pose a combustion risk.
- s. Requirement for keeping fire suppressant foam on hand at the site and for training of local fire department in response and use of required foam fire-fighting agents.

- t. Requirement to purchase a FLIR camera for the county for the county's independent inspection use for monthly inspections of facilities proximate to neighborhoods.
- u. Requirement for full sound and visual containment during drilling operations and for all lighting used to be directed downwards and shielded upwards to minimize light pollution during nighttime operations.
- v. Installation of a DB sound monitor for real-time continuous monitoring during drilling operations – require requires operator to meet commercial-level 60 dBs at all times during drilling and operations.
- w. If well operations are stopped for a period of 12 months, the operator must initiate removal of all well structures within 6 months of the 12th month that operations are ceased and complete full removal within 24 months of the last operations day and re-vegetate the site.
- x. Require operators to provide at their cost independent water testing of all drinking water wells located within ¼ mile of their facility both for an initial baseline and annually thereafter at the request of homeowners and at no cost to the homeowners.
- y. Requirement allowing Adams County access for inspections with notification, but without advance notification
- z. Requirement for an emergency response plan to be developed including a minimum of one public meeting and then an educational pamphlet to be distributed to the ½ mile radius on the emergency response plan and safety mitigation measures