

GENERAL INFORMATION REGARDING THE SUBMISSION OF COMMENTS TO ADAMS COUNTY

The County provides a 20 day comment period for oil and gas AUSR permits, beginning the day the application is accepted and posted to their website. **Comments for the Ivey Well Pad are due March 6th and should be sent to Chris Simmons at csimmons@adcogov.org.**

All comments submitted will be made public via the website after review by county staff. Recently staff have begun posting responses from the operators to the comments, although the responses tend to lack specificity. When including questions in your comments, try to make them as specific/direct as possible; perhaps the specificity of the responses will follow suit.

Comments are read by the county staff in preparation for their recommendation to approve, deny, or refer the application to the commissioners. **If you want to insure commissioners see your comments, you will need to send them directly to the commissioners in addition to Chris Simmons. Email addresses are available at www.accdan.org.**

Your comments should be about those issues or items that most concern you with the project being proposed. Examples of comments on previous applications can be viewed at www.adcogov.org/planning/currentcases, under any of the bullets that say *Referral Comments*.

SEVERAL TOPICS TO CONSIDER AS YOU CREATE YOUR COMMENTS

Application Concerns/Questions. There is nothing specific in the application that says Ward will be using pipelines to bring in water for fracking, remove fracking waste water, or pipe production off site. However, the traffic impact study engineers used those very assumptions when determining numbers of truck trips. Additionally, the site map shows 44 oil and water storage tanks on site and the pictures show large numbers of storage tanks which would imply no pipelines for production. Very specifically, what is Ward proposing? **Will trucks be transporting the necessary fresh water and toxic produced water via pipes or trucks; will the oil being produced be transported by trucks or pipeline? If the intent is to use pipelines, then pipelines must be included in the AUSR permit as Conditions of Approval, meaning the operator cannot start drilling until pipelines are in place.**

Nowhere in the application does Ward discuss the Best Management Practices (BMPs) to be used at this site which is so near neighborhoods. Surprisingly, there is not a single BMP listed on the COGCC permit for the Ivey location either.

The traffic impact study was conducted from 7-9 am and 4-6 pm on a recent Wednesday. Wednesdays are early release days in Adams12.

Road Access/Truck Traffic. The access route identified in the application has trucks coming off of I-25 at Highway 7 and continuing east on either 168th or Highway 7 to York and then south on York to the site. **This will mean thousands and thousands of industrial trucks rolling right next to 3 brand new neighborhoods that don't yet even show on the 2015 map in the application.** These people will be highly impacted by noise, diesel exhaust, road safety issues and property value concerns. **One solution is to require the truck traffic to utilized E470 exclusively, exiting and entering at York. In order to ensure**

truck drivers adhere to the route and safety standards established by the county, all trucks should have GPS devices in them that record route and speed information.

Pipelines. There are roughly 3 phases to the oil and gas development: drilling, completion (also known as fracking), and production. Pipelines cannot do anything to mitigate the 24/7 lights and noise during drilling. However, temporary pipelines can be used during the completion phase to bring in the tremendous amounts of water needed for fracking, and to then remove the highly toxic water that comes back out of the ground at the conclusion of the fracking. Without pipelines, each well drilled will require 1500-2000 truck trips for the water and waste water. Oil pipelines, which come into play during the production phase, reduce the truck trips required to empty the storage tanks each day (varies quite a bit over the life of the well) and also eliminate the need for most of the storage tanks (which means less potential for VOC emissions, spills, and reduced property values). If the county is going to require pipelines for water and oil, the requirement must be listed as a Condition of Approval in the permit which means no well should be drilled until the pipelines are ready to go.

Public Input. The only way residents impacted by this development can hear a full and complete discussion of the project by the decision makers, is to have this application be referred to the Board of County Commissioners for a public hearing. Without a public hearing, public input ends with the submission of your written comments. There is no requirement for the Ivey application to receive a public hearing. If you are interested in having all the information shared with the public and discussed in an open forum, you must request this application be referred for a public hearing. As mentioned several paragraphs above, if you want the commissioners to know this is important to you, email your comments to them directly in addition to the LGD, Chris Simmons.