

RECEIPT ACKNOWLEDGEMENT REQUESTED

DATE: February 18th, 2017

TO: Chris Simmons of Adams County (csimmons@adcogov.org)

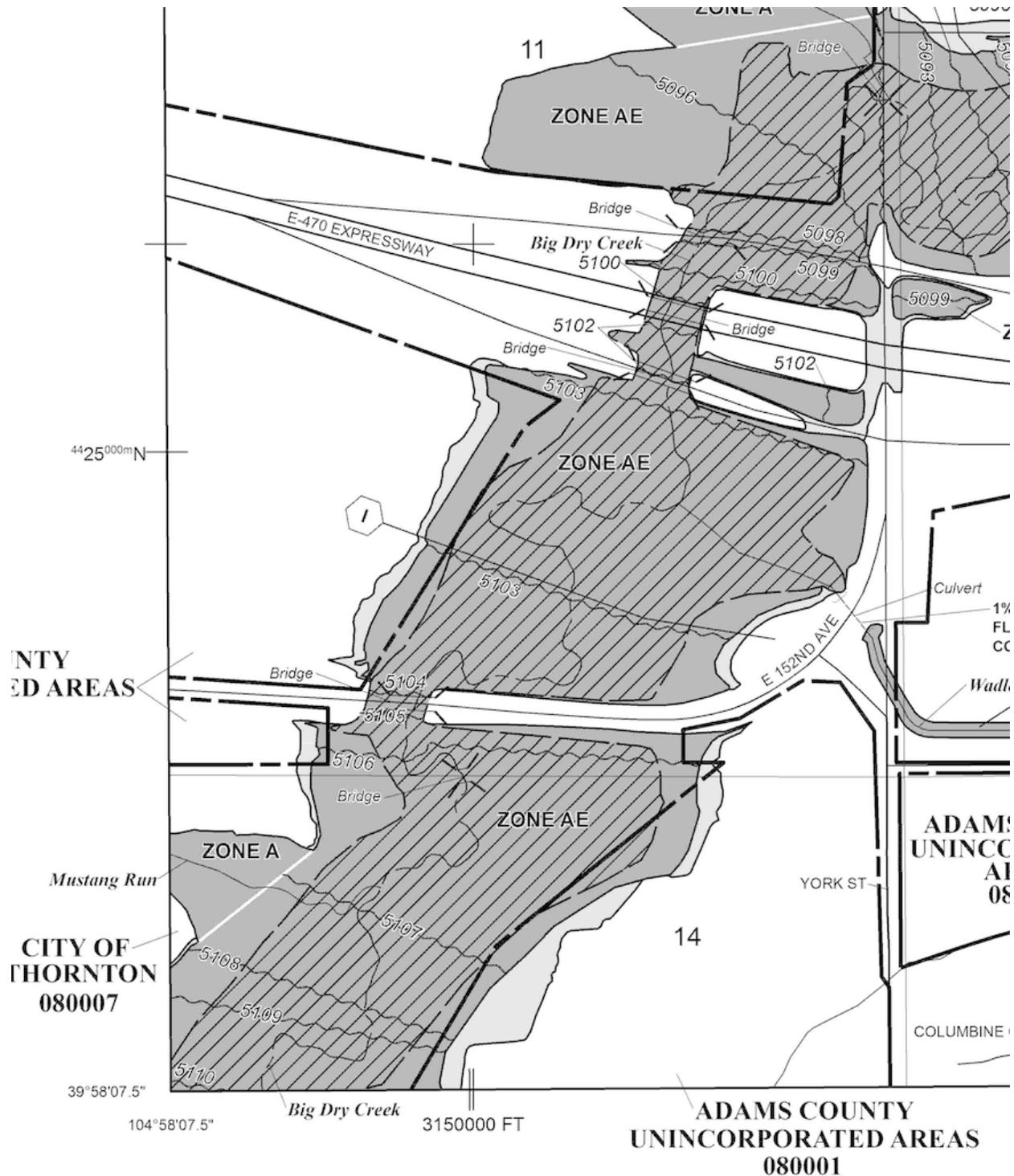
RE: https://www.adcogov.org/sites/default/files/USR2016-00006_Request_for_Comments.pdf

and https://www.adcogov.org/sites/default/files/USR2016-00006_Permit_Application.pdf

As a nearby resident in Adams County and the City of Thornton, please find enclosed my concerns about the proposed Ivey oil well site planned for 152nd Parkway.

Pubic Health & Environmental Safety Concerns

The proposal includes for onsite storage of 36 crude oil and 8 waste water tanks holding approximately 20,000 gallons each, or almost a **MILLION GALLONS** of hazardous material, in a floodplain, feet from the Big Dry Creek. Such a large industrial operation puts thousands of residents and wildlife, including eagles (located a few hundred feet to the north), foxes, and prairie dogs in unacceptable risk. At the community meeting on January 11th, 2017, the operator was not aware the facility is going to be in such a risky area, leading me to question what other details were uncertain. The application still indicates it is not in a floodplain, but it is hard to imagine as the site is only a few feet above and next to the Big Dry Creek. Comments from the Engineering Review in the application on October 7th, 2016 agree with what the FEMA maps show, that the site is inclusive of the western side of the floodplain. If Ward is trying to argue their way out of this, it is a technicality putting public and environmental safety at unacceptable risk, particularly as storms are becoming more and more severe; large-scale storage must be avoided.



The thought of a million gallons of crude oil washing down and out of the Big Dry Creek toward our community and into local water sources is of grave concern. The County or City of Thornton would never intentionally zone this farm land for such a risky industrial operation; it must not receive approval without addressing the concerns of those whose lives are at stake.

At the community meeting, the operator did not know where their emergency response team is located or what response time should be expected, nor does the application address this. Ward Petroleum is based out of Fort Collins, an hour away. I can't imagine having an emergency at the Ivey site, such as a large explosion or fire continue for an hour or more before an emergency response team arrives. Where will the needed equipment be stored to address such an emergency? The local Thornton Fire Department is ill equipped to handle such an emergency in proxy, lacking the proper equipment and training, so it cannot rest on their shoulders. From the notes in application, it is clear that the emergency preparedness plan is not complete and the project should not continue until the plan is well understood and documented. Additionally, as a parent of two children, I find it concerning that there is not necessarily (pending landowner requirements) a perimeter fence being installed; this should be required for safety reasons as part of the permit process. Adams County must ensure the safety of its tax paying residents and not permit such high risk on-site large-scale storage.

As drilling has been shown to dramatically increase local earthquake activity, the residents require that the operator reimburse homeowners establishing new earthquake coverage in response as a result of drilling operations.

Finally, a high concentration of oil well operations in the middle of an urban area is unprecedented, and as such, the impacts on public health, especially those with respiratory illnesses, due to air pollution and the output of the planned 12 VOCs are not fully understood. Furthermore, an air inversion occurs in the area quite frequently as evidenced by low lying fog. With such an operation, the pollution released into the air from the operation will literally be trapped and blanket the area. Near so many schools and homes, this is an incredibly poor location for such emissions to remain trapped. A CDPHE study should be conducted before the permit application is approved.

The large, industrial onsite storage in the middle of the NW Adams County urban area cannot be allowed due to Public Health & Environmental Safety concerns, and raw material must be pipelined out for processing to minimize these concerns should the project proceed or denied altogether.

Traffic & Safety Concerns

The setup of the site and drilling of 26 wells will require 20,000 truck trips across two-lane city roads and bridges not designed for such industrial traffic, maintained by tax paying citizens of Adams County and Thornton. Further, the intersections in the area were not designed for heavy, slow moving industrial truck traffic and will lead to congestion and additional pollution as the trucks idle at intersections, as well as frustration for those of us who live in the area.

At the Community Meeting on January 11th, 2017, the operators declared they were not required to disclose the planned oil production of the site. This has a direct impact on the number / frequency of truck trips required to haul the separated crude oil and wastewater off-site. It's not unreasonable to say it will be immensely significant, but exactly how much?? The application lists 1-2 light truck trips per day and a tanker every 1-30 days. Given a million gallons of on-site storage, I find the claim flat out incredulous.

The proposed site sits in close proximity to three major schools and is on the bus route to two of them. Our children will pass by the site and through the traffic areas twice a day. Besides the additional risk our children are placed in **WHILE** at school due to an industrial accident, their risk while **GETTING** to school will be elevated due to the constant truck traffic, carrying heavy, often hazardous material. They intend to direct the traffic to the NE to avoid Stargate School, but ignore the impact to Silver Creek Elementary School and Rocky Top Middle School, plus alternate school traffic from Trailside and adjacent neighborhoods. Peak trips are planned in the morning when children are on their way to school and parents are on their way to work, which is at its most impactful.

The site is located just to the west of a bridge along 152nd Parkway, on the north side. No auxiliary turn lane is planned (headed westbound into the site), but given the road speed of 55MPH, I do not understand how a heavy truck will decelerate that quickly, after the bridge, onto a dirt access road, with other traffic moving at such a high rate. This will create unsafe conditions, as well as congestion, as heavy trucks file in AND out of the site. This section of road suffers high winds and ice, making it more dangerous than most other roads in the area during bad weather, which will be compounded by the frequent and slow moving truck traffic.

The actual planned truck route to the NE has **MAJOR** problems with its plan to go on York under E-470 and through a narrow bridge over the Big Dry Creek just south of 156th Avenue, with no posted weight limit for the underwhelming structure. This bridge has been the site of several major accidents, including one last year damaging the bridge (yet to be repaired), and another **last month** where someone **DIED** and his son was injured due to a head-on collision between two cars. It is quite nerve wracking when you have to "thread the needle" at 55 MPH at the same time as another car - it happens about once per day for me. I can't imagine fighting with a fully loaded tanker to get over the bridge at the same time, or if two tankers are trying to cross at the same time, or our worst fears.. a tanker and a school bus full of children, in bad weather conditions. The included traffic study **COMPLETELY MISSED** the issues associated with this bridge, noted as "Bridge 2". I cannot stress enough how much of a catastrophic oversight this is.

The photos and videos included show what appears to be construction cones, but these were placed there by the local residents to warn travellers of the dangers ahead. We have been in contact with the City of Thornton, who is responsible for the bridge, and should be consulted. The City is going to conduct a study on the speed limit, but currently has no plans to replace the bridge, so no plan is in place to rectify the situation.







[Video of Traffic Passing over the narrow York Bridge](#)

The heavy truck traffic **CANNOT** be allowed to go on York. The Ward staff at the community meeting was completely unaware of this impediment and did not express any concern when it was raised by multiple attendees; people's lives are at stake.

There are similar concerns with other routes to the west and south. Simply put, the large industrial onsite storage and trucking off-site in the middle of the NW Adams County urban area

cannot be allowed due to Traffic & Safety concerns, and raw material must be pipelined out for processing to minimize these concerns should the project proceed or denied altogether. Pre-production road traffic must be routed via an alternate route, such as 152nd Parkway to Washington or on E-470.

Furthermore, with all of the HUNDREDS of other planned well sites in the area of NW Adams County, a holistic traffic study and plan must be conducted to account for the cumulative effects, such as premature wear of public infrastructure and truck-induced traffic..

Aesthetic Concerns

The Ivey site sits across the street from the several housing developments and adjacent to the Big Dry Creek Open Space purchased by the City of Thornton for the residents to enjoy the natural beauty of the area. The City is planning improvements to the open space to allow for more recreation opportunities. Locating 44 large tanks that are 16'H and 16'W and 12 VOCs that are **THIRTY FEET HIGH** as part of an industrial well site adjacent to the open space goes in vehement opposition with the use of the resident's space preservation and use of tax dollars. It is ironic that the application states it "will not affect any open space" and that it is not considered a "public gathering area" closer than 3000', when it clearly impairs the conservation values of the open space.

This new well site is located next to an existing well with three tanks that are of such disrepair that much of the paint is missing from one of the tanks, and likely rusting. Can we expect such poor maintenance and oversight of the Ivey site? How will the county ensure funds availability to properly reclaim the large operation when it ceases - what if the operator is no longer a functioning business?

Acoustical abatement wall is only included for the south end of the operation. While the operator expects that E-470 will provide some sound barrier, it will not block work lights as seen to the north. The operator needs to include a full perimeter wall during drilling operations.

Furthermore, by locating this unappealing and undesirable industrial site with its large components, noise, dirt and dust, and traffic nearby, and many cases, plain view of, many homes, will have a severe negative impact on property values and lower tax revenues for Adams County. New homes by Richmond Builders are being permitted and built directly across the street, likely within 1000' of the drill site. Despite having approved housing permits prior to Ivey, the application does not address this, despite inclusion of the development plans in the adjacent owners map to the SE (although NEGLECTS the inclusion of the Big Dry Creek open space to the east). At what point does LUMA need to be considered? As part of the application, there is no definite landscaping planned to mitigate. A picture shows what it could look like, but the operator will have no incentive to landscape after receiving approvals on their permit. A plan must be included for the approval of the permit and the operator held accountable to it. Additionally, the drilling plans

indicate the impacts could drag on for two years, painfully. The County has a duty to address these concerns in this growing residential area.

The large industrial onsite storage and trucking off-site in the middle of the NW Adams County urban area cannot be allowed due to Aesthetic concerns, and raw material must be pipelined out for processing to minimize these concerns should the project proceed or denied altogether.

Community Information Meeting

Lastly, I attended the Community "Information" Meeting held by Ward Petroleum on January 11th, 2017 at the Courtyard Marriott on 144th Avenue after the first information meeting did not meet regulations and had to be redone. I do not know the nature of the issues of the first meeting, but the second meeting was not without great concern either. As mentioned above, the staff was unprepared or unwilling to share critical project details in several areas.

Of additional concern was that the meeting was held in an **INADEQUATE** conference room of approximately 15' x 25' with a capacity limit of 41 persons (see photos). Given the approximate staffing of 10 persons, this left only about space 30 people able to access the session, despite the project being located near thousands of residents, many wishing to learn and express their concerns. At the prompting of Westminster City Police, Ward had to turn away guests and were asking those of us in the room to hurry up to make room for others. Many left in frustration. This is not an acceptable community information meeting, excluding many concerned citizens, and lacking details.



Conclusion

In conclusion, this large of a site is unprecedented in its proximity to more than 2,600 homes and thousands of residents, as well as three schools. It creates many health, safety, traffic and aesthetic concerns that should be avoided rather than band-aided. This high impact project should be brought before the Adams County Board of Commissioners for a vote with public

hearing via a Special Use Permit, rather than approved by a single individual per the brief AUSR process.

Should the project be approved, the residents request that a permanent sign be posted at the entrance to the site with a phone number to raise concerns with the operator.

Thanks for reviewing and addressing our concerns that affect so many Adams County and City of Thornton residents who have built their lives here and wish for the safe upbringing of their children. We ask that you verify all claims of the operator through the course of this process.

The Migliore Family
Trailside, 156th & York