

From: [David Jensen](#)
To: [Chris Simmons](#)
Subject: Parcel number 0157114000028
Date: Monday, October 03, 2016 6:00:09 AM

Hello,
From other gas and oil site recommendation I have been around this one is about the same only now days there are more requirements for keeping our country safer.

Thanks for your letter
David Jensen
9970 East 150th Ave
Brighton, CO

From: [J. Kowalsky](#)
To: [Chris Simmons](#)
Cc: [Jen Rutter](#)
Subject: Comments on Todd Creek Well Pad. USR2016-00002
Date: Thursday, October 20, 2016 12:39:54 PM

Please address the following:

The information regarding the production facility for Todd Creek has been fragmented and incomplete. Under the request for comments document, Ward mentions multiple production facilities. The map shows no production facilities on the Todd Creek Well Pad and a singular existing site at Riverdale. There is also a singular proposed production site at Riverdale however I found no information on the COGCC website to indicate an application has been submitted. Given that production facilities have a profound impact on the surrounding communities for decades, no Well Pad permit should be issued until the production facility has been adequately described and reviewed by the public.

Todd Creek Well Pad is a Large Facility in an Urban Mitigation Area (LUMA) and may be only the third one in the state prepared to begin drilling since the completion of the recent COGCC rule making. The other 2 LUMAs appear to be held to a much higher standard than Todd Creek. The low standards Ward was held to when they received their COGCC permits 2 years ago should be unacceptable to the county. The CDPHE should be asked to provide consultation and recommendations to minimize adverse impacts on public health, safety and welfare. And those recommendations should be included in any permit issued for the Todd Creek Well Pad. The COGCC permit for Todd Creek contains LESS THAN ONE PAGE of best management practices and conditions of approval. The permits for the other 2 LUMAs list 10-13 pages of very specific requirements for mitigating adverse impacts to public health and safety. The county needs to require similar protections in Adams County.

I would also request that Ward be given a very specific time frame in which drilling must be completed, just as the other LUMAs were. The completely open ended timeframe Ward is proposing can disrupt the community for decades and impedes people's ability to plan for such disruptions.

The county should be aware that the community surrounding the Todd Creek Well Pad did not receive their information packets in the mail until one week after the comment period opened. This left most people with just 2 weeks to review, research, understand and make comments. This is a hugely complicated issue with tremendous impact on peoples' lives. Notification must be timely and the information provided should be understandable to homeowners as well as balanced and complete. I do not feel that happened in this case and therefore request a public hearing.

Thank you,
Jacky Kowalsky
Sent from my iPhone

From: [Jennifer Gamble](#)
To: [Chris Simmons](#); [Jen Rutter](#)
Subject: Re: ACCDAN Comments on Todd Creek Farms Wells (USR2016-00002)
Date: Saturday, October 15, 2016 3:23:45 PM
Attachments: [ACCDAN Comments on Todd Creek Permit Application 10-15-2016.docx](#)

Oops. Please use this version.

On Sat, Oct 15, 2016 at 3:12 PM, Jennifer Gamble <jennifer.gamble@oppowerllc.com> wrote:

Dear Mr. Simmons,

Attached are the official public comments from Adams County Communities for Drilling Accountability NOW regarding Todd Creek Farms Wells (USR2016-00002). Please confirm receipt of these comments by reply to this email. Thanks so much, Jennifer

--

Jennifer Gamble
Managing Director
OnPoint Power, LLC
2280 E. 138th Avenue
Brighton, CO 80602
[+1 720-334-0709](tel:+17203340709)
jennifer.gamble@oppowerllc.com

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Jennifer Gamble
Managing Director
OnPoint Power, LLC
2280 E. 138th Avenue
Brighton, CO 80602
+1 720-334-0709
jennifer.gamble@oppowerllc.com



October 15, 2016

To Chris Simmons

csimmons@adcogov.org

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

From: [Tanner Dahlman](#)
To: [Chris Simmons](#)
Subject: Request for Comments: Schaefer Well Pad-USR2016-00003 & Todd Creek Farms Well Pad-USR-2016-00002
Date: Friday, October 07, 2016 11:34:17 AM
Attachments: [image.png](#)

Chris,

This is to notify Adams County that at this time School District 27J does not have any objections regarding the above case names and numbers.

Please let me know if you have any further questions.

Thank you and have a wonderful weekend.

Tanner Dahlman
Executive Secretary/Operations & Planning
School District 27J
tdahlman@sd27j.net 303-655-2827





Request for Comments

Case Name: Schaefer Well Pad
Project Number: USR2016-00003

September 30, 2016

Adams County Community and Economic Development Department is requesting comments on the following request:

Request for a Use by Special Review Permit to allow up to thirty (30) horizontal wells on one (1) well pad for the production of oil and gas.

This request is located at 13295 East 136th Avenue, Brighton.

The Assessor's Parcel Number is 0157124000017.

Please forward any written comments on this application to the Department of Community and Economic Development at 4430 South Adams County Parkway, Suite W2000A Brighton, CO 80601-8216 by October 21, 2016 so that your comments may be taken into consideration in the review of this case. Please send your response by way of e-mail to CSimmons@adcogov.org.

Thank you for your review of this case.

Christopher Simmons
Case Manager

IN FAVOR

[Signature]

14080

Brighton Rd.

BOARD OF COUNTY COMMISSIONERS

Eva J. Henry
DISTRICT 1

Charles "Chaz" Tedesco
DISTRICT 2

Erik Hansen
DISTRICT 3

Steve O'Doriso
DISTRICT 4

Jan Pawlowski
DISTRICT 5

Comment 5

From: [Michael Meyers](#)
To: [Chris Simmons](#)
Subject: Todd Creek Farms USR2016-00002
Date: Sunday, October 02, 2016 8:17:35 PM

Mr. Simmons:

We appreciate your 9/30/2016 memo asking for comment.

Due to lack of the following safeguards, we adamantly oppose this project.

This is an opportunity for politicians to offer safeguards that protect their constituency and also allow the revenue from these type of projects.

The minimum standards should be:

- 1) Indemnify Earthquake Deductibles in Homeowners policies for residents nearby (i.e. over \$25,000 for most of us - 5% of building values) in the event of an earthquake incident.
- 2) Offer an insurance policy to indemnify (most insurance companies now exclude earth movement, either manmade or by an Act of God in commercial Comprehensive General Liability policies) or a fund to indemnify for damages attributed to their operations for the benefit of nearby residents.
- 3) Provide an indemnification agreement that precludes the necessity to sue for damages and prove cause of loss for any damage arising from their operations (As determined by the Adams County Commissioners). This would set groundbreaking precedent for the good of nearby residents, AND the petroleum industry if they are interested in showing concern for damages and the goodwill of nearby residents. It would be a win-win (unless they aren't confident their processes are completely safe).

We ask that the Adams County Commissioners act in our best interests and demand the above. and energy exploration can continue with public confidence.

From: [Lori Hight](#)
To: [Chris Simmons](#)
Subject: Todd Creek Farms Well Pad - USR2016-00002
Date: Tuesday, October 04, 2016 10:36:27 AM

Christopher,

The City of Thornton received your request for comments on the Todd Creek Farms Well Pad Project Number USR2016-00002. The City has no comments on the proposal.

Thanks

Lori Hight,AICP
Senior Planner
City of Thornton
City Development
9500 Civic Center Dr.
Thornton, CO 80229
303-538-7670

From: [David Bigelow](#)
To: [Chris Simmons](#)
Cc: [Carol McKinstry](#); [sherbondy, jody](#); [Mary Ayars](#); [Paige](#); [dale robinson](#)
Subject: Todd Creek Farms Well Pad project number USR2016-00002
Date: Friday, October 07, 2016 1:31:38 PM

Mr. Simmons,

I am highly alarmed by by this proposal and completely against it! There is already an existing well located within 300 meters of the planned well head. The community that I am the HOA President for is Silver Springs and the truck traffic goes right through the entrance to our community. It was disruptive enough to have the first well built and provided zero benefit to us. We also don't support types of drilling such as Fracking which has been proven to easily put our land, homes and water at risk.

I noticed that your letter describes the surface level activity in depth but does nothing to describe the type of drilling planned, and the areas underground which will be drilled into. This lack of information also concerns me since I am not certain if this was an oversight ar an attempt to deceive us. Thus I am requesting the following questions be answered right away.

1. What type of drilling is going to be used?
2. Where are they planning to drill?
3. What indemnification agreements are in place for spills, accidents or any other damages caused by this event?
4. What is the county's plan to oversee this build and ensure continuous safety/quality monitoring?
5. Who is the primary POC at the county for any issues or concerns that may arise for our community?

Thank you for your prompt response,
David Bigelow
bigdranger@gmail.com
President of the Silver Spring HOA

From: [rsg39](#)
To: [Chris Simmons](#)
Cc: [RICK GICLA](#)
Subject: Todd Creek Farms Well Pad USR2016-00002
Date: Thursday, October 06, 2016 11:18:34 AM
Attachments: [Adams county RFC.pdf](#)

No issues with proposed activities with the Todd Creek Well Pad

Richard & Elizabeth Gicla
10033 E 150th Ave
Brighton, CO 80602 -5679

From: [Tetzlaff, Joshua](#)
To: [Chris Simmons](#)
Subject: Todd Creek Well Pad and Schaefer Well Pad
Date: Wednesday, October 19, 2016 10:51:36 AM

Christopher,

For the two above mentioned Well Pads, the City of Brighton has comments as follows:

USR2016-00002: Todd Creek Well Pad

- 1) No Comment

USR2016-00003: Schaefer Well Pad

- 1) Please provide 360 degree landscaping/screening for the project with its proximity to US-85 and 136th Avenue.
- 2) Please provide a traffic study so we can see the routes trucks will be using.
- 3) Since the City of Brighton is responsible for maintenance on 136th Avenue, the City would like to enter into a Maintenance Agreement with the Operator concerning 136th Avenue.
- 4) How was this location chosen for the Well Pad?

Joshua M. Tetzlaff

Planner II, Community Development Department
Phone :: 303.655.2072
Email :: jtetzlaff@brightonco.gov
Address :: 500 South 4th Avenue
Brighton, CO 80601

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From: [Tom Cronholm](#)
To: [Chris Simmons](#)
Subject: Usr2016-00002
Date: Thursday, October 06, 2016 9:51:50 AM

Isn't, one well enough. We have a beautiful area here. I am for developing our energy but we are just devaluating our county by stacking wells on top of each other. Why can't this oil company just pull from the same well that is a few hundred feet away. How many more wells will be put in next to this one? To say nothing of increasing the risk of problems with multiple wells.

we vote no to more wells that are stacked right next to each other.

Tom and Janice Cronholm
15151 Riverdale road
Brighton,Co.
80602

Sent from my iPad

10/4/11

DEAR CHRISTOPHER SIMMONS:

I LIVE ABOUT 400 YARDS FROM SOME OIL & GAS WELLS. RECENTLY THEY (OIL CO.) HAVE INCREASED THE # OF WELLS AND OUR WATER HAS BECOME VERY SMELLY.

I AM A REAL ESTATE INVESTOR. MY WIFE & I LOOKED FOR SOME INVESTMENTS NORTH EAST OF THORNTON AND WHEN WE GOT OUT OF THE CAR THE ODOR WAS VERY BAD. WE STOPPED SEVERAL TIMES AND THE ODOR WAS BAD EACH TIME.

I HOPE THE OIL & GAS WELLS DON'T KILL US ALL.

Sincerely,
T. H. Steele



Right of Way & Permits

1123 West 3rd Avenue
Denver, Colorado 80223
Telephone: 303.571.3306
Facsimile: 303. 571.3524
donna.l.george@xcelenergy.com

October 20, 2016

Adams County Community and Economic Development Department
4430 South Adams County Parkway, 3rd Floor, Suite W3000
Brighton, CO 80601

Attn: Jen Rutter

Re: Ward Todd Creek Farms Well Pad, Case # USR2016-00002

Public Service Company of Colorado's (PSCo) Right of Way & Permits Referral Desk has determined **there is a conflict** with the above captioned project. Public Service Company has existing electric transmission lines and associated land rights as shown within this property. Any activity including grading, proposed landscaping, erosion control or similar activities involving our existing right-of-way will require Public Service Company approval. Encroachments across Public Service Company's easements must be reviewed for safety standards, operational and maintenance clearances, liability issues, and acknowledged with a Public Service Company License Agreement to be executed with the property owner. **PSCo is requesting that, prior to any final approval of the development plan**, it is the responsibility of the property owner/developer/contractor to contact **Mike Diehl**, Siting and Land Rights Manager at (303) 571-7260 to have this project assigned to a Land Rights Agent for development plan review and execution of a License Agreement.

As a safety precaution, PSCo would like to remind the developer to call the **Utility Notification Center** at 1-800-922-1987 to have all utilities located prior to any construction.

Should you have any questions with this referral response, please contact me at 303-571-3306.

Donna George
Contract Right of Way Referral Processor
Public Service Company of Colorado