



Adams County Communities for Drilling Accountability Now (ACCDAN)  
PO Box 1023, Eastlake, CO 80614

[www.accdan.org](http://www.accdan.org)

A federally approved non-profit educational organization

November 30, 2016

Marshall Hall, Ward Petroleum  
Dave Brown, Ward Petroleum  
Kent Craig, Ward Petroleum

**RE: WARD PETROLEUM'S NOVEMBER 15 IVEY SITE NEIGHBORHOOD MEETING AND ADAMS COUNTY COMMUNITIES FOR DRILLING ACCOUNTABILITY NOW (ACCDAN) COMMENTS AND QUESTIONS**

Dear gentlemen,

ACCDAN appreciated the opportunity to attend the November 15 meeting at the Todd Creek Golf Club. ACCDAN's board members asked several questions at the meeting, however many of the answers and information was not able to be provided by Ward at the meeting. As we have not yet received any follow-up on those questions, we are submitting them to you in writing in case they did not get recorded during the open house. ***ACCDAN wholeheartedly requests your written responses via reply to our email at your earliest convenience and prior to formal permit application with Adams County.*** Our requests, questions, comments and concerns are listed below.

We also offer our initial and constructive feedback on the forum and information conveyed from our perspective as community member participants. We noted there was confusion on the invitation to the meeting which precluded attendance by many – at least one version of the invitation incorrectly listed the date as Wednesday, November 15, when the meeting was in fact Tuesday, November 15. To increase participation in the future, we also recommend that meetings be held closer to the proposed site at a more convenient location for neighborhood attendees. While the meeting served as a good introduction to generic oil and gas development, it did not present specific information needed for the public to become engaged in the Ivey site or ask questions. We would have expected an Ivey site-specific handout showing the acreage to be developed, the quantity, type and basic description of the wells, tanks and other oil and gas equipment to be installed, the access road and path, etc. It appeared the only site-specific information provided was the number of wells being proposed (26 or 52) and the maps showing the drill pathways under the surrounding neighborhoods.

While all of the Ward and subcontractor personnel were very nice, the subcontractor personnel for noise, water and stormwater controls did not seem to be aware of specific aspects of the Ivey project. This led to the provision of different answers to questions asked at these tables staffed by subcontractors versus those staffed by Ward. In addition, the photos displayed at the operations table did not accurately reflect the development of the Ivey site since they showed only 3-4 wells and a handful of tanks versus the 26 wells, tanks, and pipeline planned for Ivey. It would be more informative and reflective to show a schematic of the actual planned site layout with the 26 tanks and all associated equipment so that the neighbors can see what the site is currently planned to look like.

For future meetings, we recommend starting with a 30 minute overview presentation covering the details on the project (in order to prevent inconsistency in information/message), followed by 30

minutes of audience Q&A and then break out into the tables to provide an informal avenue for additional questions. Since the details of the Ivey site were either not yet known or not presented at the November 15 meeting, we strongly recommend Ward conduct an additional neighborhood meeting for the Ivey site once you have your plans defined for the Ivey site.

We would also like to share with you the messages that members of our board learned at the meeting from representative response to various questions so that Ward can confirm whether these are correct.

1) Ward intends to drill 26 wells at an initial Ivey site pad drilling a couple first in Summer 2017 in an exploratory/development mode and drilling the rest at an unspecified/unknown date under an unspecified/unknown timeline; 2) Then Ward intends to do a second well pad with another 26 wells (for a total of 52 wells) making the Ivey site the largest oil and gas development in the State of Colorado; 3) Ward intends to have a pipeline in place prior to drilling to minimize traffic and reduce the amount of tanks to just a few tanks rather than the 50-plus in the COGCC permit; construction on that pipeline is expected to begin in early 2017 although easements have not been secured and plans have not been provided or approved; 4) Ward does not intend to develop the Wadley site under any circumstance and is instead planning to gain access to the minerals associated with Wadley from the Ivey site. Ward currently intends to sell the Wadley site likely to another developer; 5) Ward will have to modify and resubmit its COGCC permit for Ivey because the current permit is non-reflective of its plans for Ivey.

The following are ACCDAN's specific requests, questions and concerns for your response:

- 1) Please provide a handout specific to the Ivey site that shows the acreage to be developed, the quantity, type and basic description of the wells, tanks and other oil and gas equipment to be installed, the access road and path, the potential number of trucks in general timeframes, the timetable for well installation and phasing. This handout should be emailed to ACCDAN, all meeting attendees, and mailed to those within the half mile radius. It should also be sent with the Adams County notification letter on the referral period.
- 2) Please provide the proposed route of the proposed pipeline, where it is in the process, when it will be installed (how far in advance of drilling), etc.
- 3) Will the pipeline be in place prior to the first wells being drilled and if not, what is Ward's commitment on timing for the pipeline?
- 4) Do you plan a second pad with an additional 26 wells and if so when is this project anticipated?
- 5) Please provide a description – number, height, width, length, dimensions, and purpose – of all proposed wells, tanks, equipment, etc. to be on the Ivey site.
- 6) Please provide a site plan diagram that includes equipment location, access roads, planned pipeline, planned second pad (if any), etc.
- 7) Please provide your current planned drilling schedule including start and end for first phase of 2 wells and start and end for second phase of 24 wells (keeping in mind the community's concern about limiting the drilling time/impact on surrounding areas).
- 8) Please provide your traffic access route and plans including avoiding school traffic areas.
- 9) Please provide the \$ amount of liability insurance that Ward holds to provide protections to the in the event of an accident, private property damage or injury or death to member of the public.
- 10) Please provide your planned number and types of vehicle traffic by project phase.
- 11) Please provide a list of the drinking water wells that will be tested and the timing for the testing and whether baseline and post completion testing will be performed.

- 12) Based on the recent spill involving product from Ward Riverdale site, please provide your plan for how you will protect irrigation and drainage ditches and creeks in the vicinity of the Ivey site.
- 13) When will Ward submit its revised permit application to the COGCC and will that involve a public process? Since Ward is making substantial changes to what was previously permitted, we would recommend a public process for the state permitting.
- 14) ACCDAN provides the following request for Best Management Practices for the Ivey site. These are ACCDAN's "Minimum Standard for Best Management Practices" for all large-scale multi-well facilities to be located proximate to existing or planned neighborhoods or in urbanized areas. Please provide a response of how each of these will be incorporated into the Ivey site plans.
- 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 and prohibition on any and all use of pits
  - c. Required piping in of water (no use of local wells unless operator owned)
  - d. Requirement for use of low-profile tanks for operations (12-foot tall maximum)
  - e. Required pipeline in place prior to commencement of drilling for piping out of oil and gas product to minimize traffic and emissions
  - 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 in the single largest tank to be present on the site at any given time.
  - h. 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.
  - i. 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).
  - j. Requirement for no flaring except in the case of an emergency/repair after completion
  - k. Strengthened requirements for dust control during operations, requiring that "no visible dust" is allowed to impact neighboring properties or dust on roads impacting children.
  - l. Required all permanent equipment needed for operations to be powered by electricity from the grid or to meet low emissions standards.
  - m. Restrictions on well drilling traffic for safety considerations and to avoid school schedule times and evening times when people are trying to sleep.
  - n. 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. If a project is to be completed in phases. Limit the number of phases to two phases with the first phase required to complete within a 3 month period and the second phase required to complete within a 9 month period. No more than two drilling phases is permissible.
  - o. Requirement that upon completion and for operations the well site equipment and infrastructure area must be surrounded by a fence that provides a visual barrier with a height to shield well equipment from view. Fencing is not optional and not up to the property owner. Fencing is for protection of the surrounding neighborhoods, residents and children. Safety is not optional. Agreement for vegetation and fencing must be gained by the operator in its surface owner agreements in advance of permit approval.

- p. Requirement that the site to be fenced with a 6-foot security fence and a locked gate capable of keeping children from entering the property. Fencing is not optional and not up to the property owner. Fencing is for protection of the surrounding neighborhoods, residents and children. Safety is not optional. Agreement for fencing must be gained by the operator in its surface owner agreements in advance of permit approval.
- q. 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. Agreement for vegetation and fencing must be gained by the operator in its surface owner agreements in advance of permit approval.
- r. Requirement for ensuring fire suppressant foam is on hand (via agreement with local fire response) and accessible and for training of local fire department in response and use of required foam fire-fighting agents. This should be funded by the operator and reflected in an MOA with the responding fire department.
- s. Requirement to make available for use a FLIR camera for the county for the county's independent inspection use for monthly inspections of facilities near neighborhoods.
- t. Requirement for 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.
- u. 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.
- v. 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.
- w. 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.
- x. Requirement allowing Adams County access for inspections with notification, but without advance notification.
- y. 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.

***ACCDAN wholeheartedly requests your written responses via reply to our email at your earliest convenience and prior to formal permit application with Adams County.***

Respectfully,



Jennifer Gamble

On behalf of the Board of Adams County Communities for Drilling Accountability Now ([www.accdan.org](http://www.accdan.org))