

FORM  
2A

Rev  
08/13

State of Colorado  
Oil and Gas Conservation Commission

1120 Lincoln Street, Suite 801, Denver, Colorado 80203  
Phone: (303) 894-2100 Fax: (303) 894-2109



Document Number:

400534013

Date Received:

01/06/2014

Oil and Gas Location Assessment

☒ New Location    ☐ Refile    ☐ Amend Existing Location    Location#: \_\_\_\_\_

Submit signed original form. This Oil and Gas Location Assessment is to be submitted to the COGCC for approval prior to any ground disturbance activity associated with oil and gas operations. Approval of this Oil and Gas Location Assessment will allow for the construction of the below specified Location; however, it does not supersede any land use rules applied by the local land use authority. Please see the COGCC website at <http://cogcc.state.co.us/> for all accompanying information pertinent this Oil and Gas Location Assessment.

Location ID:

**436152**

Expiration Date:

**02/17/2017**

☒ This location assessment is included as part of a permit application.

CONSULTATION

- ☐ This location is included in a Comprehensive Drilling Plan. CDP # \_\_\_\_\_
- ☐ This location is in a sensitive wildlife habitat area.
- ☐ This location is in a wildlife restricted surface occupancy area.
- ☐ This location includes a Rule 306.d.(1)A.ii. variance request.

Operator

Operator Number: 10311

Name: SYNERGY RESOURCES CORPORATION

Address: 20203 HIGHWAY 60

City: PLATTEVILLE State: CO Zip: 80651

Contact Information

Name: Brianne Visconti

Phone: (970) 737-1073

Fax: (970) 737-1045

email: bvisconti@syrinfo.com

RECLAMATION FINANCIAL ASSURANCE

☒ Plugging and Abandonment Bond Surety ID: 20090043    ☐ Gas Facility Surety ID: \_\_\_\_\_

☐ Waste Management Surety ID: \_\_\_\_\_

LOCATION IDENTIFICATION

Name: Eberle Number: 13-32CHZ

County: WELD

QuarterQuarter: NESE Section: 32 Township: 1N Range: 66W Meridian: 6 Ground Elevation: 5033

Define a single point as a location reference for the facility location. When the location is to be used as a well site then the point shall be a well location.

Footage at surface: 1355 feet FSL from North or South section line

891 feet FEL from East or West section line

Latitude: 40.004155 Longitude: -104.794695

PDOP Reading: 1.4 Date of Measurement: 11/08/2013

Instrument Operator's Name: Aaron A. Demo

## RELATED REMOTE LOCATIONS

(Enter as many Related Locations as necessary. Enter the Form 2A document # only if there is no established COGCC Location ID#)

This proposed Oil and Gas Location is:

LOCATION ID # FORM 2A DOC #

## FACILITIES

Indicate the number of each type of oil and gas facility planned on location

Wells	<u>6</u>	Oil Tanks	<u>      </u>	Condensate Tanks	<u>12</u>	Water Tanks	<u>4</u>	Buried Produced Water Vaults	<u>      </u>
Drilling Pits	<u>      </u>	Production Pits	<u>      </u>	Special Purpose Pits	<u>      </u>	Multi-Well Pits	<u>      </u>	Temporary Large Volume Above Ground Tanks	<u>2</u>
Pump Jacks	<u>      </u>	Separators	<u>6</u>	Injection Pumps	<u>      </u>	Cavity Pumps	<u>      </u>		
Gas or Diesel Motors	<u>      </u>	Electric Motors	<u>1</u>	Electric Generators	<u>      </u>	Fuel Tanks	<u>      </u>	Gas Compressors	<u>2</u>
Dehydrator Units	<u>      </u>	Vapor Recovery Unit	<u>      </u>	VOC Combustor	<u>4</u>	Flare	<u>      </u>	LACT Unit	<u>      </u>
								Pigging Station	<u>      </u>

## OTHER FACILITIES

Other Facility Type

Number

<input type="text"/>	<input type="text"/>
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Per Rule 303.b.(3)C, description of all oil, gas, and/or water pipelines:

## CONSTRUCTION

Date planned to commence construction: 02/15/2014 Size of disturbed area during construction in acres: 4.80  
Estimated date that interim reclamation will begin: 07/15/2014 Size of location after interim reclamation in acres: 1.60  
Estimated post-construction ground elevation: 5033

## DRILLING PROGRAM

Will a closed loop system be used for drilling fluids: Yes

Is H<sub>2</sub>S anticipated? No

Will salt sections be encountered during drilling: No

Will salt based mud (>15,000 ppm Cl) be used? No

Will oil based drilling fluids be used? No

## DRILLING WASTE MANAGEMENT PROGRAM

Drilling Fluids Disposal: OFFSITE Drilling Fluids Disposal Method: Other

Cutting Disposal: OFFSITE Cuttings Disposal Method: Other

Other Disposal Description:

Beneficial reuse or land application plan submitted? No

Reuse Facility ID:        or Document Number:       

Centralized E&P Waste Management Facility ID, if applicable:       

## SURFACE & MINERALS & RIGHT TO CONSTRUCT

Name: Paul Eberle Living Trust Phone:

Address: 309 County Road

Fax: \_\_\_\_\_

Address: \_\_\_\_\_

Email: \_\_\_\_\_

City: Brighton State: CO Zip: 80603

Surface Owner: ☒ Fee ☐ State ☐ Federal ☐ Indian

Check all that apply. The Surface Owner: ☒ is the mineral owner

☒ is committed to an oil and Gas Lease

☒ has signed the Oil and Gas Lease

☐ is the applicant

The Mineral Owner beneath this Oil and Gas Location is: ☒ Fee ☐ State ☐ Federal ☐ Indian

The Minerals beneath this Oil and Gas Location will be developed from or produced to this Oil and Gas Location: Yes

The right to construct this Oil and Gas Location is granted by: oil and gas lease

Surface damage assurance if no agreement is in place: \_\_\_\_\_ Surface Surety ID: \_\_\_\_\_

Date of Rule 306 surface owner consultation 10/14/2013

### CURRENT AND FUTURE LAND USE

Current Land Use (Check all that apply):

Crop Land: ☐ Irrigated ☐ Dry land ☐ Improved Pasture ☐ Hay Meadow ☐ CRP

Non-Crop Land: ☒ Rangeland ☐ Timber ☐ Recreational ☐ Other (describe): \_\_\_\_\_

Subdivided: ☐ Industrial ☐ Commercial ☒ Residential

Future Land Use (Check all that apply):

Crop Land: ☐ Irrigated ☐ Dry land ☐ Improved Pasture ☐ Hay Meadow ☐ CRP

Non-Crop Land: ☒ Rangeland ☐ Timber ☐ Recreational ☐ Other (describe): \_\_\_\_\_

Subdivided: ☐ Industrial ☐ Commercial ☒ Residential

## CULTURAL DISTANCE INFORMATION

Distance to nearest:

Building: 393 Feet  
Building Unit: 526 Feet  
High Occupancy Building Unit: 3094 Feet  
Designated Outside Activity Area: 4117 Feet  
Public Road: 795 Feet  
Above Ground Utility: 385 Feet  
Railroad: 5280 Feet  
Property Line: 200 Feet

### INSTRUCTIONS:

- All measurements shall be provided from center of nearest Well or edge of nearest Production Facility to nearest of each cultural feature as described in Rule 303.b.(3)A.  
- Enter 5280 for distance greater than 1 mile.  
- Building - nearest building of any type. If nearest Building is a Building Unit, enter same distance for both.  
- Building Unit, High Occupancy Building Unit, and Designated Outside Activity Area - as defined in 100-Series Rules.

## DESIGNATED SETBACK LOCATION INFORMATION

Check all that apply. This location is within a: ☒ Buffer Zone  
☐ Exception Zone  
☐ Urban Mitigation Area

- Buffer Zone - as described in Rule 604.a.(2), within 1,000' of a Building Unit.  
- Exception Zone - as described in Rule 604.a.(1), within 500' of a Building Unit.  
- Urban Mitigation Area - as defined in 100-Series Rules.

Pre-application Notifications (required if location is within 1,000 feet of a building unit):

Date of Rule 305.a.(1) Urban Mitigation Area Notification to Local Government: \_\_\_\_\_

Date of Rule 305.a.(2) Buffer Zone Notification to Building Unit Owners: 12/06/2013

## SOIL

List all soil map units that occur within the proposed location. attach the National Resource Conservation Service (NRCS) report showing the "Map Unit Description" report listing the soil typical vertical profile. This data is to be used when segregating topsoil.

The required information can be obtained from the NRCS web site at <http://soildatamart.nrcs.usda.org/> or from the COGCC web site GIS Online map page found at <http://colorado.gov/cogcc>. Instructions are provided within the COGCC web site help section.

NRCS Map Unit Name: Map Unit Symbol 57, Rnohill clay loam, 3 to 9 percent slopes

NRCS Map Unit Name: \_\_\_\_\_

NRCS Map Unit Name: \_\_\_\_\_

## PLANT COMMUNITY:

Complete this section only if any portion of the disturbed area of the location's current land use is on non-crop land.

Are noxious weeds present: Yes ☐ No ☒

Plant species from: ☒ NRCS or, ☐ field observation Date of observation: \_\_\_\_\_

List individual species: \_\_\_\_\_

Check all plant communities that exist in the disturbed area.

- ☐ Disturbed Grassland (Cactus, Yucca, Cheatgrass, Rye)  
☒ Native Grassland (Bluestem, Grama, Wheatgrass, Buffalograss, Fescue, Oatgrass, Brome)  
☐ Shrub Land (Mahogany, Oak, Sage, Serviceberry, Chokecherry)  
☐ Plains Riparian (Cottonwood, Willow, Aspen, Maple, Poplar, Russian Olive, Tamarisk)  
☐ Mountain Riparian (Cottonwood, Willow, Blue Spruce)  
☐ Forest Land (Spruce, Fir, Ponderosa Pine, Lodgepole Pine, Juniper, Pinyon, Aspen)  
☐ Wetlands Aquatic (Bullrush, Sedge, Cattail, Arrowhead)  
☐ Alpine (above timberline)  
☐ Other (describe): \_\_\_\_\_

## WATER RESOURCES

Is this a sensitive area: ☒ No ☐ Yes

Distance to nearest

downgradient surface water feature: 671 Feet

water well: 730 Feet

Estimated depth to ground water at Oil and Gas Location 17 Feet

Basis for depth to groundwater and sensitive area determination:

Colorado Division of Water Resources

Is the location in a riparian area: ☒ No ☐ Yes

Was an Army Corps of Engineers Section 404 permit filed ☒ No ☐ Yes If yes attach permit.

Is the location within a Rule 317B Surface Water Supply Area buffer No zone:

If the location is within a Rule 317B Surface Water Supply Area buffer have all public water supply systems within 15 miles been notified: \_\_\_\_\_

## GROUNDWATER BASELINE SAMPLING AND MONITORING AND WATER WELL SAMPLING

Water well sampling required per Rule 318A

## DESIGNATED SETBACK LOCATION EXCEPTIONS

Check all that apply:

- ☐ Rule 604.a.(1)A. Exception Zone (within 500' of Building Unit)
- ☐ Rule 604.b.(1)A. Exception Location (existing or approved Oil & Gas Location now within a Designated Setback as a result of Rule 604.a.)
- ☐ Rule 604.b.(1)B. Exception Location (existing or approved Oil & Gas Location is within a Designated Setback due to Building Unit construction after Location approval)
- ☐ Rule 604.b.(2) Exception Location (SUA or site-specific development plan executed on or before August 1, 2013)
- ☐ Rule 604.b.(3) Exception Location (Building Units constructed after August 1, 2013 within setback per an SUA or site-specific development plan)

## RULE 502.b VARIANCE REQUEST

- ☐ Rule 502.b. Variance Request from COGCC Rule or Spacing Order Number \_\_\_\_\_

ALL exceptions and variances require attached Request Letter(s). Refer to applicable rule for additional required attachments (e.g. waivers, certifications, SUAs).

## OPERATOR COMMENTS AND SUBMITTAL

Comments

I hereby certify that the statements made in this form are, to the best of my knowledge, true, correct and complete.

Signed: \_\_\_\_\_

Date: 01/06/2014

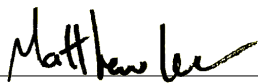
Email: bvisconti@syrinfo.com

Print Name: Brianne Visconti

Title: \_\_\_\_\_

Based on the information provided herein, this Application for Permit-to-Drill complies with COGCC Rules and applicable orders and is hereby approved.

COGCC Approved: \_\_\_\_\_



Director of COGCC

Date: 2/18/2014

### **Conditions Of Approval**

**All representations, stipulations and conditions of approval stated in this Form 2A for this location shall constitute representations, stipulations and conditions of approval for any and all subsequent operations on the location unless this Form 2A is modified by Sundry Notice, Form 4 or an Amended Form 2A.**

#### **COA Type**

#### **Description**

	Operator shall identify and sample a water well completed in the alluvial aquifer within a quarter of a mile of the location. The water well sampling, analysis and reporting shall be performed as outlined in Rule 609.d.(1)(2)(4), Rule 609.e. and Rule 609.f.
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## **Best Management Practices**

<b>No</b>	<b>BMP/COA Type</b>	<b>Description</b>
1	Traffic control	Synergy will enhance the integrity of CR 29 and incorporate dust abatement onto the road and the private access and location to mitigate the dust from the drilling and completion activities.
2	Traffic control	Synergy will utilize piping of completion water to minimize the truck traffic by 80% plus during completion operations.
3	Storm Water/Erosion Control	The attachment "other", titled "Location Stormwater Plan" details permanent site berms that are designed to protect the downstream irrigation ditch from spill or releases originating at the location. Synergy will continue the two to three foot earthen berm to insure containment of the Southern, Western and Northern edges of the drilling and production facility pad. This is shown on the plat forwarded to COGCC on 2-7-14. This will contain the storm-water on location. Brighton suggested that an water pooled be tested prior to be released though a valve and ultimately finding its way to the Fulton Ditch. Synergy's position would be that any water that pools behind the earthen berm will be Super-vac'd up by Synergy's third party contractor and taken to a certified disposal.
4	Storm Water/Erosion Control	<p>The Hay bales that will be added to the berm for the drilling and completion phases are a third level of storm-water containment. The Berm, the Hay bales and a pulled bmp ditch will be the three levels.</p> <p>Upon Approval of the 2A- Synergy will submit its final plat to the CDPHE for our Storm-water Management Permit approval from them.</p>
5	Material Handling and Spill Prevention	<p>Synergy is committed to add Full Automation to the Tank Battery Construction. This automation has the ability to shut-in any well or well(s) in the event of an abnormal situation. An example of an abnormal situation would be a change in pressure- a valve frozen open or closed, and production tank leaking production and/or emissions, an Emission Control devise malfunctioning or any other situation that could lead to an event that any operator would not deem normal.</p> <p>Synergy's practice is to have "Boots on the Ground" daily for all locations. The Automation does not take place of having our well operator visit each location daily to insure safety and normal efficient production occurring.</p>
6	Material Handling and Spill Prevention	Synergy will install groundwater monitoring wells around the production facility.
7	Dust control	Synergy will require our third party completions contractor to use the Sierra dust control system as we transfer sand for the completions process. This will mitigate and control all silicate sand during completions.
8	Noise mitigation	Synergy will contract to install a temporary sound and light wall – 30' in height – to surround the entire location for the process of drilling and completion.
9	Noise mitigation	Synergy is working with Xcel Energy to purchase electricity for this production facility to minimize noise and emissions from the Vapor Recovery unit and the compressors planned for the location.
10	Interim Reclamation	Synergy will construct a permanent eight- foot (8') earthen berm that will visually mitigate the location to neighbors on the South and West sides of the proposed location. Upon reclamation of the location- the berm with remain and be planted with wild grasses and evergreen trees to enhance the visual mitigation of the production facility.

Total: 10 comment(s)

### Attachment Check List

<u>Att Doc Num</u>	<u>Name</u>
2086279	CORRESPONDENCE
2086841	OTHER
400534013	FORM 2A SUBMITTED
400534062	ACCESS ROAD MAP
400534064	HYDROLOGY MAP
400534067	MINERAL LEASE MAP
400534070	OIL & GAS LEASE
400534072	NRCS MAP UNIT DESC
400534074	MULTI-WELL PLAN
400534087	LOCATION PICTURES
400534089	SURFACE OWNER CONSENT
400534090	OTHER
400534092	WASTE MANAGEMENT PLAN
400534250	EXCEPTION LOC REQUEST
400534251	OTHER
400535656	CORRESPONDENCE
400535661	EXCEPTION LOC WAIVERS
400535853	FACILITY LAYOUT DRAWING
400535862	LOCATION DRAWING

Total Attach: 19 Files

### General Comments

<u>User Group</u>	<u>Comment</u>	<u>Comment Date</u>
OGLA	The COGCC has completed the review of this Form 2A with consideration to the public comments that have been presented and has worked with the Operator in an iterative process to develop BMPs that are consistent with the Oil and Gas Act and COGCC Rules and Policies.	2/12/2014 2:43:13 PM



OGLA	<p>The following comment was made to each of the related well APDs, however, since it addresses primarily surface concerns, it has been pasted here (phone number of commenter redacted):</p> <p>Eberle Well-Road 29</p> <p>We have owned and lived on our property since 1987.</p> <p>Early 2011, Mid-Continent Energy, Clint Blum, contacted us to lease our mineral rights and if we did not agree they would force pool us. The well site was to be on an existing well location, the Phelps property, ½ mile away. So we agreed on a non-surface agreement, from the information told to us.</p> <p>January 6, 2014, we were told that the wells (6) were going to be drilled on the Eberle property, which is only 156 feet from our barns and less than 600 feet from the back porch of our home.</p> <p>60 plus trucks going in and out of well site per day, they will cause dust, mud, noise and exhaust fumes. The county road, 29, runs along our property line and there is a fence that runs along the road to keep our cattle in the pasture, with the additional traffic, the splashing of mud and etc. will damage the fence. All this traffic will circle around our home. The county road 29 is about 28 feet wide with no bar ditch and is very sandy and rough and most of the traffic going down this road bang and make a lot of noise already. Then when additional traffic goes to well site it will parallel our property within 75 feet and less than 500 feet from our house. This traffic will be very disturbing, as we grill on our back porch, and have for over 26 years, we have had a very peaceful county life that will now be disturbed by this drilling. Also this well site will block our Mountain view.</p> <p>The dust control they have proposed to use is mag chloride which is very corrosive, sticky and kills vegetation. Because of the additional traffic on the county road it needs to be paved and that would eliminate some of the traffic concerns.</p> <p>We will have cattle on our property from February to July, they will be calving and after calving is breeding, we artificial inseminate and embro transfer eggs to these cows, this is a very labor intense process, and the calmness of the cattle is very important to this process, with the additional noise which they are not used to could be very difficult on them and the percentage rate of accuracy is quite a bit less.</p> <p>Our water wells have not been tested, this is something that needs to be done. What is a schedule for this testing?</p> <p>Prairie dog control is another concern, are they going to be pushed onto our property or will they be under control.</p> <p>What is the final landscaping going to entail?</p> <p>Craig Rasmuson has said that the process of drilling these wells will not be a very nice experience and he would address any questions or concerns we have. He has not been very good about returning calls and getting information to me.</p> <p>Alan Vaughn</p>	2/10/2014 8:12:56 AM	
LGD	<p>Representatives of the City met with Craig Rasmuson, Vice President of Operations for Synergy Oil and Gas, on January 28, 2014. In that meeting, Mr. Rasmuson discussed and addressed Brighton's concerns and specifically agreed to the following:</p> <p>1) To level the property from the well site to the Fulton Ditch;</p> <p>2) To further clarify Synergy's representation in its January 6, 2014 letter to Mr.</p>	2/7/2014 2:17:50 PM	

	<p>Deranleau at COGCC (attached to Form 2A) regarding its intent to 'enhance the integrity of WCR 29', Synergy will:</p> <p>a)Install 6-8" road base,</p> <p>b)Add "road saver" by Durablend, and</p> <p>c)Enlarge and enhance the radii at the intersection of WCR 29 and WCR 2.</p> <p>3)As to the concerns about containment in case of storm water run-off, flood, etc., Synergy will install an adequate sump containment that will control the drainage leaving the storm drainage pond.</p> <p>4)To monitor and protect the groundwater, Synergy will provide ongoing groundwater monitoring with (i) a test location right off the center of the well pad location and (ii) one in the proximity of the Fulton Ditch.(Note:a determination of the exact locations and schedule or monitoring should be made)</p> <p>Since the meeting with Mr. Rasmuson, Synergy has filed an undated Location storm water plan depicting the drilling and post drilling at the Eberle site for the CDPHE Stormwater Permit with a copy on the COGCC website.In addition, Synergy stated that it agrees to a secondary berm/containment on the western boundary of this Eberle site, for protecting the irrigation canal/ditch to the west.</p> <p>Upon review of the information provided by Synergy including the recently provided Location Stormwater Plan, the City, especially the Stormwater Management division, has the following additional concerns and specific observations:</p> <p>For further clarification of these comments see the SWMP redline attached.</p> <p>1.Indicate specific location of buffer zone – distance between Fulton ditch and Oil/Gas operations.</p> <p>2.Indicate contours, slopes, gradient and flow direction.</p> <p>3.It is not clear how much surface will be impervious, how much runoff is expected and whether or not the proposed ditch around the pad will be able to carry flows.Where does the diversion ditch around the pad flow into?</p> <p>4.Hay bales degrade after time; the use of hay bales is only a temporary practice during construction.A hay bale barrier will not provide long-term protections.</p> <p>5.Does a hay bale wall mean that hay bales will be stacked on top of each other to create a wall of some definite height?We assume the bales are the large 4'x4'x8' but no height is shown.</p> <p>6.During the construction phase, if smaller size hay bales are used for erosion control then they will need to be entrenched and staked down following UDFCD installation detail drawings. Otherwise, they may be displaced by run-off flows; see:</p> <p><a href="http://udfcd.org/downloads/pdf/critmanual/Volume%203%20PDFs/chapter%207%20fact%20sheets/SC-03%20Straw%20Bale%20Barrier.pdf">http://udfcd.org/downloads/pdf/critmanual/Volume%203%20PDFs/chapter%207%20fact%20sheets/SC-03%20Straw%20Bale%20Barrier.pdf</a></p> <p>7.What material will be proposed instead of hay bales for long term protection?Is the 2 to 3 foot berm for the trees different from the earthen berm show in the bale wall detail?</p> <p>8.How was the containment height/capacity calculated?(Berms 2 ft. high, plus the 4 ft. hay bale wall)</p> <p>9.How/who will drain the containment area after a storm?</p> <p>10.It is not clearly indicated where the hay bale wall and ditch around the perimeter will be placed; will there be a culvert installed to cross the proposed ditch?</p>		
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	<p>11.Are any fabric liners proposed?During drilling and after drilling?Where?</p> <p>12.Dirt berms used for erosion control should be compacted, following UDFCD installation details:  <a href="http://udfcd.org/downloads/pdf/critmanual/Volume%203%20PDFs/chapter%207%20fact%20sheets/EC-10%20Earth%20Dikes%20and%20Drainage%20Swales.pdf">http://udfcd.org/downloads/pdf/critmanual/Volume%203%20PDFs/chapter%207%20fact%20sheets/EC-10%20Earth%20Dikes%20and%20Drainage%20Swales.pdf</a></p> <p>13.Consider incorporation of a small retention/detention area into the design.</p> <p>14.The proposed ditch around the pad should be vegetated to address and provide water quality treatment:  <a href="http://udfcd.org/downloads/pdf/critmanual/Volume%203%20PDFs/chapter%207%20fact%20sheets/EC-02%20Temporary%20and%20Permanent%20Seeding.pdf">http://udfcd.org/downloads/pdf/critmanual/Volume%203%20PDFs/chapter%207%20fact%20sheets/EC-02%20Temporary%20and%20Permanent%20Seeding.pdf</a></p> <p>15.We are assuming that any additional tank(s) or other facilities that will be installed on the pad will also be provided with the above-referenced secondary containment.Please confirm.</p> <p>16.Overall it is not clear what practices will be implemented long-term to protect the water quality of the Fulton Ditch from potential leaks/spills and/or regular operations.</p> <p>Due to the significant concerns of Brighton regarding this application, request is made that the Commission attach the specific agreements of Synergy identified herein as conditions to the permits and in addition to require Synergy to address with conditions the comments and concerns previously set forth or stated above and on the redlined SWMP.</p>		
OGLA	<p>Uploaded "Location Stormwater Plan" as provided by Synergy that details site berms that will contain potential spills or releases at the location. This plan was developed in consultation with the City of Brighton in order to provide protection to the city water supply, specifically the irrigation ditch downgradient from the location to the west.</p>	2/6/2014 11:21:53 AM	
Public	<p>1.Request a moratorium on drilling operations so that Synergy can drill from existing Phelps well or find a more suitable location.</p> <p>2.We inadvertently learned of 6 wells proposed to be drilled just over 1,000 from our home.Our neighborhood of about 12 homes on Kelly Lane and many more homes just to the east of us were not notified of the proposed Eberle well because Synergy moved the drilling site to the west a few yards due to a waiver granted by the State.Their claim is that the surface owner (also mineral owner), Mr. Eberle of Boulder, requested the move.Craig Rasmuson of Synergy informed me that if the initial drilling site had been used, all of our neighbors on Kelly Lane would have been notified.Thus the most severely affected have not been informed nor had an opportunity to be heard by the State of Colorado. Neighbors will have heavy trucks driving on gravel along their back yards if this project is approved.</p> <p>2.It appears that several structures to the west, including private residences, are within 500 of the proposed site.</p> <p>3.Synergy proposes to bring tankers to the east from US HWY 85 onto Baseline Road (aka 168th Ave. or WCR 2).The intersection of Brighton-maintained Baseline Road and WCR 29 sits at the center of a hill sloping sharply upward from west to east.Baseline Road is not improved on the hill portion, with no shoulders.It is a dangerous intersection to pull in and out of. According to Synergy, 40 to 80 large tankers will traverse this road each day, intermingling with heavy traffic, school buses, pedestrians and bicyclists.The left turn onto WCR 29 is very sharp from this stretch of road, very unsafe given the current amount of traffic even for a personal vehicle.</p> <p>Egress from WCR 29 onto Baseline is quite hazardous with the amount of traffic.People are heading into downtown Brighton, going to and from work, school, and onto HWY 85.Just to the east of the hill are several densely populated Brighton</p>	1/31/2014 12:59:15 PM	

	<p>subdivisions. New subdivisions are also being created just to the west of the site. An elementary and a middle school are located less than a mile from the proposed site, with schoolbuses traversing the heavy traffic. Children ride their bikes along Baseline, pedestrians traverse the area, even though it is dangerous. A deaf child lives at the intersection of Baseline and WCR 29.</p> <p>4. Our street, Kelly Lane, runs just a few feet east of and parallel to WCR 29, the proposed ingress to the wellhead. Both Kelly Lane and WCR 29 are narrow gravel roads with little county maintenance. WCR 29 is a VERY restricted gravel road that abuts properties on Kelly Lane to the east. It is a short road built for residential access that runs from WCR 2 (Baseline/168th) only to WCR 2 1/2. It was not constructed for through traffic. Synergy proposed to Weld County that this tiny portion of WCR 29 be paved, but Weld County flatly declined. The resulting DUST and particulates in the air would render our properties unliveable, because so many heavy trucks would be entering and leaving graveled WCR 29 each and every day. There is no mitigation plan from Synergy, except to say that they would try to finish by mid summer so we can open our windows before summer is over, and using a company called Envirotech for dust.</p> <p>5. An existing rig, the Phelps, located north of WCR 2 1/2 was originally designated to drill additional wells for mineral exploitation currently being proposed by the Eberle well. The Phelps well is accessed from WCR 4 (a wider and much less traveled road) in an environmentally safe manner via a road direct to the wellhead.</p> <p>6. Mr. Rasmuson said that the Eberle well will enable the company to drill an additional 3 wells from the Eberle wellpad. Given the proximity to large numbers of people who face the possibility of loss of property value, the immense ingress and egress problems arising from the proposed site, the resulting particulate matter pollution and potential for leakage into many nearby shallow private wells and well water supplying the City of Brighton, the costs appear to greatly outweigh the benefits in this case.</p> <p>7. I personally suffer from asthma and glaucoma. I am a psychotherapist with a private practice in our home on Kelly Lane. We have lived here for nearly 28 years.</p>	
Public	<p>Oil gas exploration is imperative to the future financial and long-term growth success of Synergy, and payouts for disruptions in the form of legal settlements to local communities are expected during these exploratory phases. However, it doesn't seem all implicit costs have been accounted for in this particular situation. This potential drill location has a significant amount of developing children in the surrounding communities, and the developmental legal payouts for the exposed natural gas into the surrounding atmosphere would be more than substantial, and would be extremely detrimental to the future expeditions.</p> <p>Synergy seeks to endure. Citing one of Synergys key Business Strategies, the company seeks to Maintain financial flexibility while focusing on controlling the costs of our operations, the resulting legal consequences drilling in the proposed Eberle site would be nothing short of failing to abide by one of Synergys key Business Strategies. I urge you to reconsider the placement of the wells in well at the proposed Eberle site to aid in the future financial growth and success of Synergy.</p>	1/30/2014 2:53:01 PM

Public	<p>New Eberle Pad-6 Horizontal Wells</p> <p>Requesting an extension to comment period until appropriate solutions to City of Brightons issues are resolved, as stated in their comments.</p> <p>The Phelps Pad-6 Horizontals nearing completion is only 2500 north of the proposed site at the Eberle property, and is only capable of handling 3 additional horizontals to the south 1/2 of Section 32 (per C. Rasmuson at Synergy). Assuming it is possible to extract natural gas from the south 1/2 of Section 32 by the Phelps location, can a waiver be obtained to allow 6 horizontals and eliminate the need for the Eberle pad that affects many homes and families? Does the City of Brighton, Weld County government, and COGCC, and Synergy Resources really think this is a sound</p> <p>decision to build a new well site adjacent to multiple neighborhoods?</p> <p>Will Synergy Resources guarantee or promise not to contaminate the City of Brightons raw water supply? The City of</p> <p>Brighton states in their comment that Eberles Pad-6-Horizontals is located in The Critical Raw Water Protection Area used by Brighton to re-charge wells. This is alarming, considering it is only 17 below the proposed pad, and 85% of Brightons domestic water supply is from wells. Continuing with any plan to drill 6 wells in this location means risk to</p> <p>Brightons domestic water resource is acceptable, unless the operation is stopped or relocated.</p> <p>The air quality near WCR 29, WCR 2.5, and Kelly Lane is already filled with dust and particulates with normal traffic. Synergy Resources estimates 30 to 40 or possibly 80 tanker trucks 24/7 for a number of months accessing the location</p> <p>from WCR 29. Common sense is that the air quality will be in violation of clean air standards.</p> <p>Approval of this natural gas operation on Eberles property risks contamination to Brightons water quality, and is likely not required for mineral extraction in the S/2 of Section 32.</p>	<p>1/29/2014 2:02:27 PM</p>	
LGD	<p>1. The pad site (on the 20 acre parcel) and six wells are located in the "Critical Raw Water Protection Area" of the City (see attached map). Brighton relies on well water for approximately 85% of its domestic supply. The alluvium that supplies these wells flows in a northwestern direction. The estimated depth to groundwater is a mere 17 feet. The topography of the site shows an approximate fifty (50) foot drop (to the northwest). Thus, any spills, releases, stormwater or other run off or other contamination would rapidly, negatively and significantly impact this critical raw water supply.</p> <p>a. Additional berming (at the ditches), extensive enhanced liners at the tank site and the pad site, and other containment improvements are a necessity.</p> <p>b. There is no Stormwater Management Plan identified in the BMP.</p> <p>c. There is no Emergency Spill Plan identified in the BMP.</p> <p>d. Emergency Management Plan must address immediate response protocol to address potential incidents as well as plan for remediation.</p> <p>2. The large pad site is located between the Fulton Ditch (to the west) and the Brighton Lateral (to the east). The pad site is located upstream and only 600' from the Fulton Ditch. Brighton relies on these ditches as essential to its domestic water</p>	<p>1/27/2014 2:21:08 PM</p>	

	<p>supply, for augmentation and to re-charge existing domestic wells. The topography of the site shows an approximate fifty (50) foot drop (to the northwest). The estimated depth to groundwater is a mere 17 feet. Thus, any spills, releases, stormwater or other run off or other contamination would rapidly, negatively and significantly impact the Fulton Ditch. Additional berming (at the ditches), extensive enhanced liners, and other containment improvements are a necessity.</p> <p>a. Additional berming (at the ditches), extensive enhanced liners at the tank site and the pad site, and other containment improvements are a necessity.</p> <p>b. There is no Stormwater Management Plan identified in the BMP.</p> <p>c. There is no Emergency Spill Plan identified in the BMP.</p> <p>d. Emergency Management Plan must address immediate response protocol to address potential incidents as well as plan for remediation.</p> <p>3. Weld County Road 2 (WCR2) is located within the corporate limits of Brighton and has been recently improved. Brighton is solely responsible for its maintenance (repair). WCR 29 is a gravel road with limited access from the well pad, limited to WCR 2 ½ to the north and then west to Highway 85 or to the south to WCR2. Brighton's Code restricts construction traffic from 7:00 a.m. to 7:00 p.m. on WCR2.</p> <p>a. Operator has not provided a BMP for traffic management showing (i) truck traffic route(s); (ii) number of trips/day; (iii) hours when traffic will occur; (iv) noise management/containment; (v) dust management/suppression. The 1/6/14 letter from Synergy to COGCC (#3) states it will "enhance the integrity of County Road 29" but does not indicate what specific improvements will be made, including the necessary improvements at the intersection of WCR29 and WCR2.</p> <p>b. The turning radii at the intersection at WCR 2 and WCR29 are not adequate to sustain the expected truck traffic, going both east and west on WCR2, and must be built up accordingly.</p> <p>4. The Application provides that the pad site will include 6 separators, 12 condensate tanks, 4 VOC combustors, 4 water tanks, 2 temporary large volume above ground tanks and 2 compressors.</p> <p>a. Since this is a large pad site with a considerable number of structures, the Operator should coordinate with the responsible fire protection agency to address the necessary fire and safety measures in addition to those required under the COGCC Rules.</p> <p>b. Note: The Brighton Fire Protection District is a special district, separate and distinct from Brighton.</p> <p>5. If there are unstated BMPs that Synergy will implement in excess of the normal they should be disclosed in the ADPs and OGLA for review and comment by the City.</p>	
Public	<p>Installing a new oil and gas well site at this proposed property will negatively affect the quality of life and welfare of many families. Not only those who own properties near the site, but those who regularly visit those homes. The noise and visual pollution are risks, but also contamination to ground water which many of these homes use.</p>	<p>1/22/2014 1:32:10 PM</p>

Public	<p>Installing a new oil and gas well site at this proposed property will negatively affect the quality of life and welfare of many families. Not only those who own properites near the site, but those who regularly visit those homes. The noise and visual pollution are risks, but also contamination to ground water which many of these homes use.</p>	1/22/2014 1:32:09 PM
Public	<p>Please leave our land alone!!!!!!PLease dont frack near our homes.</p>	1/21/2014 9:43:42 AM
Public	<p>WE WANT NO MORE WELLS!! NOTHING TO DO WITH THE DESTRUCTION OF THE PLANET!!! These well pad sites near our homes and families affect our health, livelyhood, and water for future generations.By polluting our water supply, the oil and Natural gas companies are not only hurting us, they are hurting their own childrens future also.AND FOR WHAT?!</p> <p>A PROFIT? when the \$\$ is spent and gone, the pollution remains.There will be no water for any of us if this continues on. No water, no life.....</p>	1/20/2014 9:38:18 AM
Public	<p>I am requesting that the coment period for this site be exteneded 10 days so that we can gather information regarding assurances made by synegy resources. Craig Rasmuson stated he would give those families in the impact zone a list of assurances he made durng our meeting on 1-11-14. See below Craigs email response. I emailed Craig with the notes, see the the attached file. Craig stated he would try to get it back to me that afternoon, that was Tuesday 1-14-14. it has been 5 days and I have not received word 1 from Craig. His email repose is below:</p> <p>Thank you-</p> <p>I will try to work on the response and addtions later today-</p> <p>Regards-</p> <p>Craig Rasmuson</p> <p>Vice President of Operations</p> <p>Synergy Resources Corporation</p> <p>If this is an example of a response from Synergy, the public needs more time to get accurate information from Synergy resources.</p> <p>My notes to Craig Rasmuson</p> <p>Impact: 24/7 operation with shift changes at 5am and 5pm; 15-20 semi-tractor trailers during initial phase;during 60 -80 semi-tractor trailers; the greatest impact in noise and traffic occurs during the completion phase</p> <p>Purpose for moving the well from its current location to proposed location is due to timeliness and profit. There are no natural obstacles to accessing resources from current location; Site was not moved west of location into fields because farm land is a conservation easement.</p> <p>Well site management: will be managed a municipal well; "green" Fracking site;</p> <p>Assurances: Visual mitigation 6'ft berm with a 30'ft fence and hay bales to reduce</p>	1/19/2014 7:24:38 PM

	<p>sound; dust mitigation Virotech and road maintenance on rd 29; promised to meet with Alan Vaughn (A. Vaughn) regarding the road maintenance with the possibility of paving rd 29; additionally will meet with A. Vaughn to discuss the placement of berm next to his fence line; promised to meet with; promised A. Vaughn to pay for relocation his cattle if the noise impact disturbed the herd during calving season February – March 2014; Promised site was “Green” Fracking ; Drivers would not exceed posted speeds, if so they would be terminated; Synergy is a smaller corp that can micro-manage its sites in order to ensure public health and safety; Air quality to be managed and maintained; It will be noisy</p> <p>Contractors mentioned: MM Excavation; dust control Virotech, Suncorp; Enson Drilling;</p> <p>Well site details: Oil Natural gas. 6 wells to be struck from the site; “Green” Fracking site; once established the well will be fully automated with twice daily site visits by management</p> <p>Contacts:</p> <p>Craig RasmusonVP of synergy operations</p> <p>Tel: 970-737-1073/cell: 970-518-6205 email: crasmuson@sryginfo.com</p> <p>Greg Deranleau Oil Gas Assessment Supervisor Colorado oil Gas Conservation commission</p> <p>303-894-2100 ext. 5153</p> <p>Dave/David Stewart EPA</p> <p>Dave Bauer Road 29 maintenance</p> <p>Dave Pauling (?)</p> <p>Unknowns: IPT (?)</p> <p>Thank you</p>	
OGLA	Extended comment period per Weld County LGD request (request was made via e-mail for the 6 related APDs).	1/17/2014 9:32:41 PM
Permit	Corrected cultural distances to match Location Drawing per operator. Renamed location to match reference well, corrected GPS location and footage FEL. Ready to pass.	1/16/2014 1:50:18 PM
Permit	Corrected right to construct to oil and gas lease. Confirming distances to Building Unit and Utility which do not match Location drawing.	1/16/2014 11:45:26 AM
Permit	Passed completeness.	1/7/2014 9:53:58 AM
Permit	Returned to draft for the following: 1. NRCS Map Unit description not attached. 2. Location Drawing w/ 500-foot radius showing improvements not attached. 3. Facility Layout Drawing not attached. 4. Missing 603.a.(2) exception request to Director and signed waiver from offset surface owner within 150' of property.	1/7/2014 7:49:13 AM

Total: 18 comment(s)