



STATE OF
COLORADO

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Tabula Rasa Andreatta Variance Request

Deranleau - DNR, Greg <greg.deranleau@state.co.us>

Tue, Mar 18, 2014 at 4:31 PM

To: "krodell@upstreampm.com" <krodell@upstreampm.com>

Cc: "Agross@upstreampm.com" <Agross@upstreampm.com>, Larry Coler - DNR <larry.coler@state.co.us>

Kim,

As we just discussed, I am going to put this back on hold while you follow up on disturbance size, and the public comment.

FYI, here are the public comment and LGD comment from the Form 2A:

Public:

I am the one who started the move-on petition. The purpose was to gain support to request a public meeting with Tabula Rasa. If some of the 142 petition signers contacted Director Lepore, it was on their own initiative, and not at my suggestion. In the absence of a response from Tabula Rasa to date, I request that approval of this permit be postponed until such a time that a meeting is held. There are a number of issues that need explanation, including these.

- (1) Gas plant venting. Will this new well increase venting volume? What is being vented?
- (2) Lighting. Will this well be illuminated at night?
- (3) Enhanced Oil Recovery. What is it? Will it be done in Huerfano County?
- (4) The Blue Lake CO2 pipeline. Where is it located?
- (5) Local jobs and tax revenues. Is Huerfano County getting a fair deal?

LGD:

Correspondence from LGD to CDPHE regarding consultation request: there are 3 provisions that area residents have expressed concern about are Public water system protection As I understand it the Concerns of area residents regarding the close proximity of water run off drainage to the proposed well locations fear the potential for contamination to these water ways in times of summer rains and spring run off. The surface water is 240 feet for the caddell and 260 feet for the andratta This drainage flows into middle creek Middle creek is sometimes used to augment water supply to Walsenburg I am not sure if this would be under public water system protection or stormwater management. In view of the flooding up north recently there is a great concern that the caddell location is within the flood plain and there fore at risk to be damaged with contamination of waterways so close to the well site. We are seeking a proposal of safeguards (best management practices) at these well sites to prevent environmental insults in a flooding situation.

Odor an dust

The county roads leading to these well sites are dirt/gravel roads. These county roads are designed to carry passenger vehicles and pick up trucks some with trailers. The reality of travel characteristic of energy extraction is unique involving intense periods of very large and heavy vehicles. Drilling 2 wells involves approximately 500 truck trips, considerably more if stimulation techniques are used. Rig trucks have 20,000 to 30,000 times the load impact of a passenger car. With these figures in mind and the condition of the county roads leading to the well site it would be impossible to think that this traffic would not impact a substantial

increase in fugitive dust production. We would like the CDPHE to recommend practices the permit application operator could employ to mitigate this issue. It is felt that the amount of fugitive dust produced may be a nuisance and a health hazard especially considering a population in a previous coal mining area with respiratory issues being a major health concern in this area. The Colorado regional health profiles published by the CDPHE in 2010 reports age adjusted rate of mortality due to chronic lower respiratory disease in Huerfano county per 100,000 population is 83.1 as compared to the state at 51.4.

Dale Lyons

Huerfano County LGD

As you recall, we did consult with CDPHE on stormwater, and Tabula Rasa agreed to implement a stormwater and erosion plan as indicated in BMPs.

Thanks for your help.

Greg

[Quoted text hidden]