

# Vetting 15-H OGLA Questions/Corrections

1) Although there are no production facilities on this proposed Oil and Gas Location, the nearby Vetting Facility location will produce these wells and is within 1,000 feet of Building Units. Therefore, in the Cultural section of the Form 2A, the two check boxes should have been checked and a siting rationale for describing why the proposed production facilities are being placed within 1,000 feet of Building Units should have been included on this Form 2A. Please provide me with a detailed Siting Rationale for why the production facilities are being placed where they are proposed. Some of the points you made in your June 23, 2016, email to me should also be included in your Siting Rationale. Be sure to also include a discussion of all alternative locations that were considered for the production facilities and why those other locations were not chosen.

**See Site Rationale attachment.**

2) Your Best Management Practice (BMP) #5 indicates Extraction is currently working through the Use by Special Review (USR) application with Weld County. Now that the Weld County USR process is complete, this BMP needs to be updated to indicate the outcome of the USR application and include discussion of the neighborhood meeting and public hearings that were held as part of the Weld County USR process.

**The Use by Special Review application was approved by Weld County Board of County Commissioners on June 29, 2016. Prior to the Board hearing, a neighborhood meeting was held on June 2, 2016. Building unit owners within 1000' feet of the proposed Vetting 15-H well pad and Vetting Facility and property owners within 500' of the subject property were invited to the meeting. Extraction gave a summary presentation on the proposed project and answered questions for five attendees. The Weld County Planning Commission hearing was held the following week on June 7, 2016. The Planning Commission unanimously recommended approval of the USR application by the Board of County Commissioners.**

3) Your BMP #8 on Traffic Control describes the haul route agreed upon that will utilize Cherry Avenue and 24th Street. It is my understanding that Extraction is seeking approval/permission from CDOT to directly access US Business Highway 34 to the east to avoid using Cherry Avenue and 24th Street. Please provide a status update on how that is progressing as success with this should go a long way to addressing one of the most pressing concerns with this location.

**The Board of County Commissioners added a condition of approval to the Use by Special Review that states that Extraction shall attempt to obtain an access permit through CDOT for an access onto Business Highway 34. We are currently working on the CDOT access permit application. As part of the application, a Traffic Impact Study (TIS) is being completed by a professional traffic engineer for Business Highway 34. The traffic engineer is meeting with CDOT this week to discuss the requirements of the TIS and then will begin existing traffic counts. It is anticipated that the TIS will be completed in 4 to 6 weeks. Once completed, the access permit application will be submitted.**

In the event the access permit cannot be obtained from CDOT the Cherry access will be used. Extraction agreed to an additional condition of approval through the USR that truck traffic will avoid school pick up and drop hours.

4) Your BMP #11 on the Leak Detection Plan states "Operator will monitor production facilities on a regular schedule to identify fluid leaks...". Please provide more specificity on what this regular schedule will be.

**Revised the BMP to the following:**

**604.c.(2)F. Leak Detention Plan: Operator will monitor production facilities daily to identify fluid leaks, including, but not limited to, visually inspecting all wellheads, tanks and fittings. Additionally annual SPCC inspections will be conducted and documented. Annual flowline testing will also occur according to COGCC rules 1101 and 1102. Inspection and record retention of flowline testing will be in accordance per COGCC regulation. All records will be made available to the COGCC upon to request.**

5) Your BMP #17 on Noise Mitigation discusses the use of sound walls. In your June 23, 2016, email to me you indicated the Extraction is committed to using high line power to power the drilling rig. Please provide me with an updated Noise Mitigation BMP that includes this commitment along with the use of sound walls.

**Please add the following Noise BMP:**

**Operator will power the drilling rig off of high line power. The proper infrastructure will be supplied by the electric company.**

6) Extraction has indicated that water from nearby irrigation canals and the South Platte River will be brought to the location via temporary water pipelines for completion activities in an effort to reduce truck traffic. To further address the noise, dust, and odors associated with well completion activities, has Extraction given any consideration to remote fracking operations for these wells and why is it not being used?

**Extraction considers remote stimulations operations to be technically and economically unfeasible at this location. Remote stimulation operations would pose an increased safety risk to both the public and our employees, increase the duration of our operations, and would not result in an increased benefit to the public. To conduct a remote stimulation operation, completion operations would be moved from the location to another property potentially over a mile away. This results in greatly lengthening the high pressure pipes that are used to transport stimulation slurry and potentially aligning these pipes in near building units and public roads. Additionally, remote stimulation operations would require Extraction to purchase the right to locate our equipment outside of developed areas, likely resulting in damages to private landowner's crops. In addition to the increased risks to safety, burden upon private property owners and costs to the operator, it is likely remote stimulation operations would increase the duration of our stimulation operations. The added pipe length increases the chance for spills and the potential to freeze during the winter months and would increase the time it takes to flush the pipe if a "screen out" were to occur.**

7) To further address the health, safety, and welfare concerns of nearby residents to this Oil & Gas Location, will Extraction commit to using remote shut-in capabilities of the wells in case of emergency or upset conditions. If so, please provide me BMPs that address this.

**Please add the following BMP:**

**Operational system will be automated to allow remote shut in, remote monitoring, and off-site response to emergencies.**

8) Now that the Public Comment period has ended, please provide me with a letter certifying compliance with COGCC Rule 306.e. Please also include in the letter a discussion of the consultations and public meetings that were held.

I will provide this as soon as I hear back from the last BUO that requested a consultation.