

## **Public Comments**

The following comments were provided by members of the public and were considered during the technical review of this application.

### **No. Comment**

### **Comment Date**

1	<p>Salt Ranch, LLC ("Salt Ranch") is the surface owner of the land where the Salt Ranch Fee 202-1015H well is proposed to be located. Salt Ranch objects to the approval of this permit for the following reasons:</p> <p>1.CCRP Operating Inc. ("CCRP") does not have a Surface Use Agreement with Salt Ranch.CCRP abandoned negotiations on September 14, 2017 upon Salt Ranch's request for information material to the negotiations, including the oil and gas leases that allegedly grant CCRP rights to develop the mineral estate underlying Salt Ranch.</p> <p>2.The Colorado Oil and Gas Conservation Commission ("Commission") lacks jurisdiction to grant CCRP's application.CCRP has not evidenced any rights it has related to the development of the mineral estate underlying Salt Ranch.</p> <p>3.CCRP lacks legal authority to drill from the location proposed in this pending application.Colorado law strictly prohibits the use of one surface owner's land to access the mineral estate underlying a different surface owner's land. Stone Wolf, L.L.C. v Three Forks Ranch Corp., 2004 U.S. Dist. Lexis 31671, *22-23 (D. Colo). The proposed well would access minerals under lands not owned by Salt Ranch.In addition, the accommodation doctrine limits CCRP's use of the surface to that which is reasonable and necessary. C.R.S. 34-60-127(c).As proposed, CCRP seeks unnecessary surface locations.</p> <p>4.CCRP is in violation of Commission rules and regulations.CCRP's application contains materially false information. In addition, CCRP has failed to consult with Salt Ranch in good faith regarding the location of wells, facilities, roads, and flowlines, as required by Commission Rule 306.</p> <p>A letter dated November 1, 2017 detailing Salt Ranch's objections to this and other applications for wells on its land is on file with the Commission and CCRP.</p>	11/08/2017
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Total: 1 comment(s)