

## Public Comments

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

<u>No.</u>	<u>Comment</u>	<u>Comment Date</u>
1	<p>TO: John Noto, COGCC Oil and Gas Location Assessment Supervisor</p> <p>Email: john.noto@state.co.us</p> <p>Doug Andrews, COGCC OGLA Northeast Location Specialist</p> <p>Email: doug.andrews@state.co.us</p> <p>FR: Matt Sura, Attorney at Law</p> <p>DT: 8/6/2018</p> <p>RE: Comment on Form 2s: Little Lady 22-7NH, Little Lady 22-2CH, Little Lady 22-6CH, Little Lady 22-3NH, Little Lady 22-4CH, Little Lady 22-5NH, Little Lady 22-1NH</p> <p>Dear COGCC,</p> <p>These comments are being made on behalf of the Surface Owner, Gerald Richardson. Mr. Richardson opposes the proposed oil and gas development on his property located on W/2 Section 22 Township 11N, Range 64W in Weld County, Colorado. Please accept this comment for all seven proposed Form 2s (Applications for Permit to Drill – “APDs”) listed above.</p> <p>Mr. Richardson urges the COGCC to deny the location for the following reasons:</p> <p>1)The Operator, Upland Exploration, does not have a surface use agreement with Mr. Richardson.</p> <p>2)Upland Exploration has failed to consult with Mr. Richardson in good faith regarding the location of wells, facilities, roads, and flowlines, as required by Commission Rule 306.a.</p> <p>3)Upland Resources is proposing oil and gas development from a location that will result in waste and is in conflict with a spacing application that is on file with the COGCC: Docket No. 180700572.</p> <p>4)Upland Exploration lacks legal authority to drill from the location proposed in this pending application. The accommodation doctrine limits Upland Exploration’s use of the surface to that which is reasonable and necessary. C.R.S. 34-60-127(c). As proposed, Upland Exploration seeks unnecessary surface locations.</p> <p>According to COGCC public records, the Operator has not proposed a Form 2A location assessment for the surface location. The Surface Owner respectfully requests that staff review of the Little Lady wells be delayed until the Form 2A has been submitted and is deemed complete.</p> <p>Furthermore, Mr. Richardson requests that the undersigned be immediately notified of any decision on these applications so he may consider a request for a hearing on this application pursuant to COGCC Rule 503.b.(7)C. In the event he is not notified of an approval of these APDs, please accept this comment letter as a formal and timely request for a hearing on the applications.</p> <p>Thank you for your assistance in this matter.</p> <p>Sincerely,</p> <p>Matt Sura</p>	08/06/2018

Total: 1 comment(s)