

**From:** Kendra Tempest [ktempest1@gmail.com]  
**Sent:** Tuesday, August 01, 2017 12:09 PM  
**To:** Christopher LaMere  
**Subject:** Comments on Project # USR2017-00004

Dear Christopher,

Thank you for giving us the opportunity to comment on your Great Western Operating Company B-Farm LD Pad project.

We are owners in the Eagle Shadow Subdivision at 5725 Eagle Shadow Avenue.

Our comments are as follows:

1. We prefer to not have another well pad constructed so close to the existing large production area already on Highway 7 at Monaco. We moved to the country to enjoy wide open spaces, uninterrupted farm land, and to escape the noise and lights that this well pad will produce.
2. Also, we feel that if the well pad goes thru, the entrance/exit needs to be off Colorado Boulevard to the south and NOT Highway 7. The highway is too busy at that location and with speeds at 60 plus mph it will be too dangerous for all traffic if big equipment vehicles are entering and exiting off/on Highway 7.

Thank you for the opportunity to comment.

Kendra and Ron Tempest  
5725 Eagle Shadow Avenue

**Comment 1**

**From:** Rob Migliore [robmigliore@gmail.com]  
**Sent:** Monday, August 07, 2017 9:21 PM  
**To:** Christopher LaMere  
**Cc:** house@themiglioeres.com  
**Subject:** Comments on the B-Farm LD oil well site

DATE: August 7th, 2017

TO: Christopher LaMere [clamere@adcogov.org](mailto:clamere@adcogov.org)  
RE: [http://www.adcogov.org/sites/default/files/DOCS-%235615439-v1-B-FARM\\_PAD\\_AUSR\\_APPLICATION\\_REVISD\\_20170713\\_PDF.PDF](http://www.adcogov.org/sites/default/files/DOCS-%235615439-v1-B-FARM_PAD_AUSR_APPLICATION_REVISD_20170713_PDF.PDF)  
and [http://www.adcogov.org/sites/default/files/Request%20for%20Comments\\_0.pdf](http://www.adcogov.org/sites/default/files/Request%20for%20Comments_0.pdf)

As a nearby resident in Adams County and the City of Thornton, please find enclosed my concerns about the proposed B-Farm LD oil well site planned for SE of Highway 7 and Colorado Boulevard.

### **Pubic Health & Environmental Safety Concerns**

The 36 well proposal includes for a high density of onsite storage of 36 crude oil and 6 waste water tanks holding 23,000 gallons each, or almost a **million** gallons of hazardous material, adjacent to a 100-year floodplain (or likely in a 500-year floodplain encountered more frequently with climate change), within a mile radius of 500+ homes. The berm is said to only account for 110% of the largest *tank* so it would overflow in the case of multiple tank failures. This goes against best management practices which pipelines crude material away to limit potential for spills, VOCs emissions, and odors from a large industrial complex in the midst of a growing urban area. The proposal then goes on to postulate about the possibility of a pipeline being installed, but does not confirm if it is in plan. This is especially critical as the density of wells in this area of Adams County is projected to grow to an alarming level of 200 within a 6 mile by 4 mile area, or over 100 within a 2 mile by 2 mile area, a density which the CDPHE admits further evaluation for public health & safety is needed. A CDPHE study should be conducted to assess the impact to resident's health due to high density of wells in the area. Furthermore, if the project is approved, it must be conditional on the use of a pipeline instead of so much on site storage in consideration of public health and environmental safety concerns.

### **Traffic & Safety Concerns**

The setup of the site and drilling of 36 wells will require >5,400 truck trips across a two-lane 55 MPH county road not designed for such frequent heavy traffic (some days will average more than 100 trips). The access to the site does not have turn lanes or adequate acceleration / deceleration lanes, further contributing to genuine safety concerns and traffic congestion.

The included traffic management plan does not indicate the expected quantity of ongoing production truck trips will be generated. The application is unclear whether a pipeline will be used. If it is not used, thousands of unnecessary, dangerous trips will be incurred.

Furthermore, with all of the hundreds of other planned well sites in the area of NW Adams County, a holistic traffic study and plan must be conducted to account for the cumulative effects, such as general public safety, traffic and premature wear of public infrastructure. If the project is approved, it must be conditional on the use of a pipeline instead of so much on site storage in consideration of traffic & safety concerns.

### **Project Duration Concerns**

The application does not bound the timing for drilling all 36 wells. That leaves the impact to the residents from drilling operations as open ended. The approval of the project should be conditional on a timeframe of no longer than 6 months to complete the wells, with new approvals subject to current regulations required for additional drilling periods.

## **Conclusion**

In conclusion, this large of a site is unprecedented in its proximity to more than 500 homes and thousands of residents. It creates many health, safety, traffic and aesthetic concerns that should be avoided rather than band-aided. This high impact project should be brought before the Adams County Board of Commissioners for a vote with public hearing via a Special Use Permit, rather than approved by a single individual per the brief AUSR process.

Should the project be approved, the residents request that a permanent sign be posted at the entrance to the site with a phone number to raise concerns with the operator.

Thanks for reviewing and addressing our concerns that affect so many Adams County and City of Thornton residents who have built their lives here and wish for the safe upbringing of their children.

The Migliore Family  
Trailside, 156th & York

**From:** Mark Mellen [mmellen@me.com]  
**Sent:** Wednesday, August 09, 2017 2:38 PM  
**To:** Christopher LaMere  
**Cc:** Mark Mellen  
**Subject:** Comments RE: Request for a Use by Special Review Permit to allow thirty-six (36) horizontal well on one (1) well pad for the production of oil and gas.

As a nearby resident in Adams County and the City of Thornton, please find enclosed my concerns about the proposed B-Farm LD oil well site planned for SE of Highway 7 and Colorado Boulevard.

### **Pubic Health & Environmental Safety Concerns**

The 36 well proposal includes for a high density of onsite storage of 36 crude oil and 6 waste water tanks holding 23,000 gallons each, or almost a **million** gallons of hazardous material, adjacent to a 100-year floodplain (or likely in a 500-year floodplain encountered more frequently with climate change), within a mile radius of 500+ homes (many more under construction now). The berm is said to only account for 110% of the largest *tank* so it would overflow in the case of multiple tank failures. This goes **against** best management practices which pipelines crude material away to limit potential for spills, VOCs emissions, and odors from a large industrial complex in the midst of a growing urban area. The proposal then goes on to postulate about the possibility of a pipeline being installed, but does not confirm if it is in plan. This is especially critical as the density of wells in this area of Adams County is projected to grow to an alarming level of 200 within a 6 mile by 4 mile area, or over 100 within a 2 mile by 2 mile area, a density which the CDPHE admits further evaluation for public health & safety is needed. A CDPHE study should be conducted to assess the impact to resident's health due to high density of wells in the area. Furthermore, if the project is approved, it must be conditional on the use of a pipeline instead of so much on site storage in consideration of public health and environmental safety concerns. **IDEALLY, ADAMS COUNTY COMES TO THEIR SENSES AND DOES NOT ALLOW SUCH A PROJECT BASED ON POOR PERFORMANCE OF O&G OPERATORS.**

### **Traffic & Safety Concerns**

The setup of the site and drilling of 36 wells will require >5,400 truck trips across a two-lane 55 MPH county road not designed for such frequent heavy traffic (some days will average more than 100 trips). The access to the site does not have turn lanes or adequate acceleration / deceleration lanes, further contributing to genuine safety concerns and traffic congestion.

The included traffic management plan does not indicate the expected quantity of ongoing production truck trips will be generated. The application is unclear whether a pipeline will be used. If it is not used, thousands of unnecessary, dangerous trips will be incurred.

Furthermore, with all of the hundreds of other planned well sites in the area of NW Adams County, a holistic traffic study and plan must be conducted to account for the cumulative effects, such as general public safety, traffic and premature wear of public infrastructure. If the project is approved, it must be conditional on the use of a pipeline instead of so much on site storage in consideration of traffic & safety concerns.

## **Project Duration Concerns**

The application does not bound the timing for drilling all 36 wells. That leaves the impact to the residents from drilling operations as open ended. The approval of the project should be conditional on a timeframe of no longer than 6 months to complete the wells, with new approvals subject to current regulations required for additional drilling periods.

## **Conclusion**

In conclusion, this large of a site is unprecedented in its proximity to more than 500 homes and thousands of residents. It creates many health, safety, environmental, traffic and aesthetic concerns that should be avoided rather than band-aided. This high impact project should be brought before the Adams County Board of Commissioners for a vote with public hearing via a Special Use Permit, rather than approved by a single individual per the brief AUSR process.

Should the project be approved, the residents request that a permanent easily visible sign be posted at the entrance to the site with a phone number to raise concerns with the operator and police support to enforce the operator to comply with standards.

Thanks for reviewing and addressing our concerns that affect so many Adams County and City of Thornton residents who have built their lives here and wish for the safe upbringing of their children.

The Mellen Family

Trailside, 159th & York

Comment 3

**From:** Michael [mhernandez527@yahoo.com]  
**Sent:** Wednesday, August 09, 2017 10:31 AM  
**To:** Christopher LaMere  
**Subject:** Re: RE: RE:

Sorry I had originally had the site in the subject line but somehow it was deleted. I'm referencing site

B-Farm LD oil well site planned for SE of Highway 7 and Colorado Boulevard

Case name: Great Western Operating Company B-Farm LD Pad

Project Number: USR2017-00004

On Aug 9, 2017, at 10:22, Christopher LaMere <[CLaMere@adcogov.org](mailto:CLaMere@adcogov.org)> wrote:

Dear Michael,

If your comments are specific to a case please provide the case name or case number. If the required information is not provided your comments will not be included as part of the case review. Please feel free to call me with any questions at 720.523.6891.

Sincerely,

<image003.jpg>Christopher LaMere

Oil & Gas Liaison, *Community & Economic Development Department*

ADAMS COUNTY, COLORADO

4430 South Adams County Parkway, 1st Floor, Suite W2000A

Brighton, CO 80601

o: 720.523.6891 | [clamere@adcogov.org](mailto:clamere@adcogov.org) [www.adcogov.org](http://www.adcogov.org)

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**From:** Michael [<mailto:mhernandez527@yahoo.com>]

**Sent:** Wednesday, August 09, 2017 10:16 AM

**To:** Christopher LaMere

**Subject:** Re: RE:

<http://journals.brandonu.ca/jrcd/article/view/1181>

<http://www.sciencedirect.com/science/article/pii/S0264817214000609>:

<https://www.google.com/amp/kdvr.com/2017/01/26/report-28000-gallons-of-oil-gas-drilling-waste-water-gushed-from-well-near-hudson/amp/> Silver Creek elementary and my neighborhood is well within the range of 2 million square feet

<http://www.denverpost.com/2017/04/18/firestone-home-explosion-missing-persons/>

<http://onlinelibrary.wiley.com/doi/10.1890/110053/full>

<http://www.tandfonline.com/doi/abs/10.1080/10807039.2011.605662>

Thank you

On Aug 9, 2017, at 09:30, Christopher LaMere <[CLaMere@adcogov.org](mailto:CLaMere@adcogov.org)> wrote:

Dear Hernandez Family,

Thank you for your comments, can you please provide reference for the case these comments are in reference for?

Thank you,

Christopher LaMere  
Oil & Gas Liaison, Community & Economic Development Department  
ADAMS COUNTY, COLORADO  
4430 South Adams County Parkway, 1st Floor, Suite W2000A  
Brighton, CO 80601  
O: 720.523.6891 | [clamere@adcogov.org](mailto:clamere@adcogov.org)  
[www.adcogov.org](http://www.adcogov.org)

-----Original Message-----

From: Michael [<mailto:mhernandez527@yahoo.com>]  
Sent: Tuesday, August 08, 2017 10:20 PM  
To: Christopher LaMere  
Subject:

Concerns for this proposed site is very alarming. There are hundreds of homes around this site, thousands of people living around this site and an elementary school less then a mile from this site. Possibly for public exposure to chemicals, oil, heavy tanker trucks and contaminated water put everyone, especially the children living around this area, at huge health risks. The risks that this site puts on the the school is unfathomable. Why would you want to put innocent children at risk? With recent research showing more and more concrete casings failing over the years and water contamination increasing, the health of the residents of Adams county shouldn't be put on the line. As a native and Thornton resident I want to help preserve the natural beauty that is our city, county and state. Oil and gas sites take away from that beauty.

Thank you for listening to our concerns,

The Hernandez Family  
Trailside community

Comment 4



**From:** Sharon [sharonandbob1@comcast.net]  
**Sent:** Wednesday, August 09, 2017 4:40 PM  
**To:** Christopher LaMere  
**Subject:** well sites at Colorado Blvd ad Highway 7

We are writing this to ask Adams County not to issue a permit for the Assessor Parcel # 0157107000016. This property is close to residential areas and the access roads to this parcel of land, Highway 7 and Colorado Blvd. are heavily traveled and in need of repair right now, let alone with heavy machinery traveling them constantly. Highway 7, especially, cannot keep up with the traffic. The noise and light pollution coming from these wells will do nothing but harm the quality of life of those residents for a number of miles surrounding these wells. That is to say nothing of the pollution to our air and soil.

**Please do not issue a permit for  
Assessor Parcel #015710700006  
for any oil drilling!**

Bob and Sharon Huckins

5755 E 165th Pl.

Brighton, CO 80602

Eagle Shadow North

Comment 5

**From:** Grant Penland [Grant.Penland@cityofthornton.net]  
**Sent:** Thursday, August 10, 2017 12:51 PM  
**To:** Christopher LaMere  
**Subject:** RE: Request for Comment - Great Western B-Farm

Chris-

Thank you for the opportunity to review the referenced application. Please accept the following comments regarding the B-Farm LD Pad Use by Special Review Permit (USR2017 00004). Based on the response to the comments below, the City of Thornton may have additional comments or request further information.

**Site Mitigation:**

The City of Thornton requests the opportunity to review a final/detailed landscape plan, including information regarding proposed planting (species, size, etc.), irrigation, fencing, screening and berms. The City also requests to review a lighting plan and believes that the plan should propose to eliminate any light trespass from the site.

**Traffic Management:**

The City of Thornton requests the opportunity to review a detailed traffic plan/study for the proposed well site, including information regarding the quantity and type of traffic to/from the site. Based upon the provided access road map, the City does not find the operator's desired access route acceptable, as it passes a school located at 144th Avenue and Washington Street. The operator should be required to utilize SH-7 for access to I-25 instead of Colorado to 144th Avenue to I-25. Additionally, the 144th Avenue and Colorado Boulevard intersection is too small to accommodate frequent turning movements by heavy vehicles. The City is also concerned with material tracking onto SH-7 from the unpaved, existing access road. The York Street/152nd Parkway/Washington Street route to 144th Avenue is also prohibited for the same reason. The Colorado Department of Transportation (CDOT) will need to review proposed access to SH-7, and an access permit may be needed from CDOT if the operator desires modification of the existing access. There is no eastbound left turn lane or westbound right turn lane at the existing access on SH-7. Please be advised that CDOT might take issue with this condition if the operator desires to bring heavy vehicles to the site from the east on SH-7.

**Emergency Response:**

The City of Thornton requests the opportunity to review an emergency response plan for the proposed well pad. The City also requests that the operator engage with the Thornton Fire Department and North Metro Fire Rescue District regarding emergency response planning. Additionally, the City requests initial and ongoing response training with the operator on the site. Furthermore, the City requests that no flaring occur at this site, but if flaring does occur that the City of Thornton Emergency Communications Center be notified.

Sincerely,

-Grant

**Grant Penland, AICP** | Current Planning Manager | City of Thornton  
9500 Civic Center Drive, Thornton, CO 80229  
V: 303.538.7218 | Email: [grant.penland@cityofthornton.net](mailto:grant.penland@cityofthornton.net)

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**From:** Christopher LaMere [<mailto:CLaMere@adcogov.org>]

**Sent:** Thursday, July 20, 2017 11:30 AM

**To:** Robb Kolstad <[Robb.Kolstad@cityofthornton.net](mailto:Robb.Kolstad@cityofthornton.net)>; Grant Penland <[Grant.Penland@cityofthornton.net](mailto:Grant.Penland@cityofthornton.net)>; [brandon.marette@state.co.us](mailto:brandon.marette@state.co.us); Adam Kraich <[AKraich@adcogov.org](mailto:AKraich@adcogov.org)>; Chris LaRue <[CLaRue@adcogov.org](mailto:CLaRue@adcogov.org)>; Aaron Clark

<[AClark@adcogov.org](mailto:AClark@adcogov.org)>; Kuster - CDPHE, Kent <[kent.kuster@state.co.us](mailto:kent.kuster@state.co.us)>; [dgh920@mesanetworks.net](mailto:dgh920@mesanetworks.net); [kmonti@sd27j.org](mailto:kmonti@sd27j.org); Pat Hamilton <[pat.hamilton@adams12.org](mailto:pat.hamilton@adams12.org)>; [sbarwick@unitedpower.com](mailto:sbarwick@unitedpower.com); [donna.l.george@xcelenergy.com](mailto:donna.l.george@xcelenergy.com); [lbrotten@tchd.org](mailto:lbrotten@tchd.org)

**Subject:** Request for Comment - Great Western B-Farm

## Request for Comments

Case Name: Great Western Operating Company B-Farm LD Pad

Project Number: USR2017 00004

July 20, 2017

Adams County Community and Economic Development Department is requesting comments on the following request:

**Request for a Use by Special Review Permit to allow thirty-six (36) horizontal well on one (1) well pad for the production of oil and gas.**

This request is located at approximately southeast of Colorado Blvd. and Highway 7.

The Assessor's Parcel Number is 0157107000016.

Please forward any written comments on this application to the Department of Community and Economic Development at 4430 South Adams County Parkway, Suite W2000A Brighton, CO 80601 8216 by **August 10, 2017** so that your comments may be taken into consideration in the review of this case. Please send your response by way of e-mail to [clamere@adcogov.org](mailto:clamere@adcogov.org).

The complete Use by Special Review Permit application can be found at [www.adcogov.org/planning/currentcases](http://www.adcogov.org/planning/currentcases).

Additional Oil and Gas information can be found at [www.adcogov.org/oil-and-gas-information](http://www.adcogov.org/oil-and-gas-information).

Thank you for your review of this case.



Christopher LaMere

Oil & Gas Liaison, *Community & Economic Development Department*

ADAMS COUNTY, COLORADO

4430 South Adams County Parkway, 1st Floor, Suite W2000A

Brighton, CO 80601

o: 720.523.6891 | [clamere@adcogov.org](mailto:clamere@adcogov.org)

[www.adcogov.org](http://www.adcogov.org)



August 9, 2017

Christopher LaMere  
Adams County Community and Economic Development Department  
4430 S Adams County Parkway  
1<sup>st</sup> Floor, Suite W2000  
Brighton, CO 80601

RE: Great Western Operating Company B-Farm LD Pad, Southeast of Colorado  
Boulevard and Highway 7, USR2017-00004  
TCHD Case No. 4512

Dear Mr. LaMere:

Thank you for the opportunity to review and comment on the Use by Special Review for the 36 horizontal wells on 1 pad located at Colorado Boulevard and Highway 7. Tri-County Health Department (TCHD) staff has reviewed the application for compliance with applicable environmental and public health regulations and principles of healthy community design. After reviewing the application, TCHD has the following comments.

### **Domestic Wastewater Management**

Proper wastewater management promotes effective and responsible water use, protects potable water from contaminants, and provides appropriate collection, treatment, and disposal of waste that protects public health and the environment. TCHD, as the local public health agency, plays a role in reviewing whether a new proposed land use has addressed the domestic water and wastewater needs and is the regulating agency for On-Site Wastewater Treatment Systems (OWTS). Because of the nature of oil and gas operations and the typical location of this land use, not in close proximity to existing wastewater facilities, many of the oil and gas sites utilize OWTS.

TCHD permits the use of OWTS including septic tanks and vault systems. If the site utilizes an OWTS or vault system for domestic wastewater, the applicant will need to obtain a Use Permit from TCHD. Please contact Mike Weakley at 720-200-1593 or [mweakley@tchd.org](mailto:mweakley@tchd.org).

### **Baseline Water Quality Testing**

Water quality is unregulated in domestic and irrigation wells in Colorado and monitored in a limited manner for commercial wells. This means water quality testing is typically not required, and the water quality is often unknown. In general, TCHD supports baseline water quality testing to establish the existing water quality relative to the water well's permitted use and to identify water quality issues that should be known and addressed by the well's owner. Baseline water quality testing can also provide an understanding of pre-existing conditions should the water quality change in the future.

Baseline and subsequent water quality testing data can support a determination of whether water treatment may be needed to protect the health of well water users and the health of the environment.

*Specific Recommendations for Water Wells within ½ mile:*

TCHD believes that any owner of a well within one-half mile of the proposed oil and gas operation should have the opportunity to obtain a baseline water quality test prior to the change in land use. One-half mile is the area of influence established by the Colorado Oil and Gas Conservation Commission's Final Rule 609 Statewide Groundwater Baseline Sampling and Monitoring.

TCHD recommends the following for well permits and water rights holders located within one-half mile of the proposed oil and gas well as they are likely used or will be used for drinking water for humans or animals.

- That the County or applicant notify owners of the wells or groundwater rights owners of the proposed application;
- That the County refer well owners who want to test their wells to TCHD for guidance on recommended testing parameters, procedures for selection of qualified sampling professionals and laboratories, and sharing of data; and
- That the County refers well owners desiring guidance for wellhead protection to TCHD.

**Water Supply for Use by Workers**

Providing clean and safe water for use by workers for ware washing, food preparation, hand washing, and showering is important. The majority of foodborne illnesses can be traced to improper food handling procedures in home, retail, or office kitchens. Improper transport, storage, cross-connections, and backflow also pose dangers to potable water quality.

TCHD will need to review information regarding the source of water for workers as well as any proposed potable water system used by workers. If the drinking water is to be hauled, a public water system identification number for the water hauler must be provided to TCHD.

**Potential Temporary Water Storage**

Non-potable water is often used onsite at oil and gas sites. The storage tank should be marked with a sign indicating the water is non-potable. In addition, these very large water storage tanks have the potential to collapse if not properly constructed with appropriate quality controls. A collapse can result in significant damage to the environment, property, and individuals that may be nearby. TCHD recommends the applicant employ proper quality control techniques when constructing the water storage tank.

### **Above Ground Storage Tanks**

Fuel is often stored onsite at oil and gas sites. All storage tanks must have a secondary containment area, a routine monitoring system to check for leaks, and best management practices implemented in order to prevent the release of contaminants into the soil and water supplies.

### **Emergency Response Plan/Spill Reporting**

One of the most common environmental releases associated with oil and gas drilling operations is the inadvertent surface spill of chemicals, produced water, or flowback water. No Emergency Response Plan was available for review with the referral materials. The Emergency Response Plan should include response and notification procedures for responding to and effective strategies for minimizing the risk of hydrocarbon spills, hazardous chemical spills, and produced water spills. If a spill or incident were to occur, the emergency response to spills should be indicated in the Spill Prevention, Control, and Countermeasures Plan that is kept onsite.

Specific information related directly to a potential leak or spill from the domestic wastewater system should also be addressed. In the event there is a domestic wastewater spill or leak, TCHD should be contacted immediately.

### **Air Quality Permitting**

Air pollutant emissions including flares are regulated by the Colorado Department of Public Health and Environment. Vapor recovery equipment should be used to control the release of vapors into the environment. The use of green completion technology is strongly encouraged at every site. If the site is to use multiple flares and combustors, the oil and gas industry permits should include a regulatory analysis determining the applicability of state and federal air quality permitting requirements and air pollution control regulations for the proposed emissions source(s). More information as well as all forms can be found online at <https://www.colorado.gov/pacific/cdphe/all-permits>.

### **Dust Control and Mitigation**

TCHD encourages the applicant to follow best management practices for erosion control on the site, specifically to minimize excessive dust from land disturbance. This will help minimize the environmental impact resulting from any construction and land disturbance on the site. TCHD encourages any reclamation, including site pad minimization, and reseeding activities to occur as early as possible. This prevents erosion, helps control excessive weeds, and can provide some benefit to air quality.

### **Traffic Safety**

Oil and gas production and monitoring wells involve significant truck traffic to and from a site during the construction and drilling process. TCHD commends the applicant for including traffic control in their best management practices and TCHD encourages the County to designate a primary traffic route for all construction traffic and deliveries. If the trucks servicing the site will be traveling on a local school bus route, we encourage the

Great Western B-Farm LD Pad  
August 9, 2017  
Page 4 of 4

County to work with the applicant to minimize traffic during hours when school buses are in operation.

Please feel free to contact me at 720-200-1575 or [kboyer@tchd.org](mailto:kboyer@tchd.org) if you have any questions on TCHD's comments.

Sincerely,

A handwritten signature in cursive script, appearing to read 'K Boyer', followed by a horizontal line extending to the right.

Kathy Boyer, REHS  
Environmental Health Specialist III

cc: Sheila Lynch, Monte Deatrich, TCHD



Dedicated to protecting and improving the health and environment of the people of Colorado

July 28, 2017

Christopher LeMere, Oil and Gas Liaison  
Community and Economic Development Department  
4430 South Adams County Parkway, Suite W2000  
Brighton, CO 80601-8204

Re: Case No. USR2017-00004

Dear Mr. LeMere,

The Colorado Department of Public Health and Environment (Department) has the following comments on Case No. USR2017-00004 the Great Western B-Farm Well Pad. The Department reviewed the application documents submitted to Adams County and Colorado Oil Gas Conservation Commission as well as visiting the location to consider methods to reduce the impacts to the surrounding residents. Listed below are four recommendations for the Great Western B-Farm project. They include

- Relocating the access road;
- Emission control technology for tank servicing and unloading;
- Locating all equipment within the sound walls; and
- Supporting the construction a berm.

#### [Relocating the access road](#)

Great Western has proposed construction of an access road on the west side of the well pad in close proximity to residential structures. This situation creates a long-term nuisance to those residents and does not appear to be necessary. The drawings submitted with the application indicate a drainage ditch on the east side of the well pad; however, upon closer inspection of the site conditions the drainage ditch is difficult to see and appears not to be used. The Department recommends that the access road be located to the east side of the well pad to reduce the nuisance conditions from ongoing truck traffic and if the drainage ditch is necessary, construct it alongside of the road. Controlling emissions from the well site will also reduce the impacts from this oil and gas site.

#### [Emission control technology for tank servicing and unloading](#)

In Colorado, oil and gas companies are beginning to use emission control technology to minimize emissions during tank servicing and unloading activities. These practices are simply good neighbor policies and can have a positive impact when locating an oil and gas facility within the ozone non-attainment area. The Great Western B-Farm well pad includes more than thirty storage tanks. The use of emission control



technology will reduce emissions during tank servicing and unloading over the life of the wells. The Department recommends that Great Western use this technology at the B-Farm wellsite. Noise from oil and gas operations is another issue for nearby residents.

#### Locating all equipment within the sound walls

Sound walls are proposed for this project and the Department recommends that all equipment capable of generating noise be located within the sound walls to reduce noise and minimize impacts to surrounding residents. Visual mitigations are also important for oil and gas facilities that may be operated for thirty years or more.

#### Supporting construction of a berm

Great Western is proposing construction of a berm on the west side of the well pad for visual mitigation. The Department supports this practice and recommends the construction of this berm prior to any drilling and completion activities.

Please contact Kent Kuster at 303-692-3662 with any questions.

Sincerely,

*Kent Kuster*

Kent Kuster  
Environmental Specialist  
Colorado Department of Public Health and Environment

