



Community & Economic Development Department

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MEMORANDUM

**USR2017-00002 Administrative Memo**

**Date:** October 18, 2017

**Case Name:** Extraction – Prairie Center Well Pad

**Request:** A Use by Special Review Permit to allow sixteen (16) horizontal wells on one (1) well pad for the production of oil and natural gas.

**Address:** 16500 East 132<sup>nd</sup> Avenue, Section 29, Township 1S, Range 66W (N/2 of SW/4)  
Parcel number 0156929100001

**Zoning Designation:** Agriculture-3 (A-3)

**Future Land Use Designation:** Agricultural

**Applicable regulations Section of the Development Standards and Regulations:**

Per Section 4-10-02-05-09 of the County's Development Standards and Regulations, the Administrative Use by Special Review (AUSR) permit for an oil and gas facility shall automatically include as conditions of approval all provisions of the MOU executed by the applicant.

**Conformity with Development Standards and Regulations:**

The conditions of approval included in the AUSR permit allow the oil and gas facility to satisfy the compatibility requirement of the Administrative Approval Criteria (Section 4-10-02-05-02).

**Referral Comments/Concerns:**

Of the twenty-two (22) referral notices sent to property owners within one half mile of the proposed facility, one (1) citizen comment was received with concerns about traffic impacts. As described in the report and in the application documents, the applicant will be directing traffic east on 132<sup>nd</sup> Avenue, away from residences, in order to gain access to Interstate 76 as expeditiously as possible. In addition, pipelines will also be utilized so that long-term truck traffic impacts can be mitigated. The application and Request for Comments were also posted on the Adams County website for the review of the general public.

Emergency Management requested the operator update the contact information in the Emergency Preparedness Plan. Adams County Development Review Engineering reviewed the subject request and informed the applicant that a permit for the proposed access will be required. The operator is to provide the County contact information for nearby property owners who are electing to receive baseline well water test per Section 6(c) of the MOU.

The City of Brighton responded with concerns about locating a large oil and gas well pad on this site, specifically, traffic management, access routes to the proposed location, and the large number of tanks proposed. Brighton is also requesting that the applicant implement additional best management practices once the Prairie Center land is annexed into Brighton. In response to these concerns, Adams County has required the applicant to utilize the approved traffic route and any modification shall require an amendment to the AUSR permit. The applicant will connect to a nearby pipeline for transportation of product from the site in lieu of onsite storage and truck traffic. A visual mitigation plan is required to address the future compatibility of the facility with planned commercial development.

To provide sound and visual mitigation during the drilling and completions phase, Extraction Oil and Gas will construct temporary walls that will be placed along the edges of the pad; this will also block out lighting that may impact nearby residences. To address the potential for dust and traffic concerns, the applicant will reduce the number of vehicles with use of a pipeline and apply water to the road and pad surface as needed.

Industrial impacts inherent to large-scale oil and gas development require significant mitigation from residential and commercial development. The most significant long-term impacts associated with oil and gas production are the daily truck trips and the number of tanks required for on-site storage of oil. Taking into consideration the compatibility requirements of the Adams County Development Standards and Regulations, the operator shall use the existing pipeline for the transportation of oil and gas products from the site to minimize the impacts of truck traffic associated with the production phase, reduce the number of onsite storage tanks and allow for the proposed well pad to be more harmonious with the surrounding area.

Short-term impacts to surrounding properties are to be mitigated through a combination of site planning decisions, traffic and access management, and sound mitigation measures. Long-term compatibility is addressed through the requirement for landscaping and screening, as well connecting to a pipeline for the transfer of products. These mitigation measures maximize the compatibility of the site for both current and future uses.

Recommended Conditions of Approval:

Conditions Precedent:

1. Pad construction and/or drilling shall not commence until combined State approval of Colorado Oil and Gas Conservation Commission (COGCC) Form 2 and 2A and County approval of AUSR permit. Drilling shall only occur during the COGCC Form 2 permit validity timeframe.
  - a. Per section 4-10-02-05-10 of the Adams County Development Standards and Regulations, proposed changes to the plans, including but not limited to, any changes in the source or location of water to be used by the Oil and Gas Facility, shall be submitted as amendments to the Administrative Use by

Special Review application, reviewed by staff, and approved by the Director or BOCC (if the BOCC approved the original application).

2. Adams County has determined that visual mitigation of the site is required to provide compatibility with the surrounding area. Prior to initiation of construction, the applicant shall submit a landscaping and screening plan for the site to be reviewed and approved by the Community & Economic Development Department staff. Screening of the site shall be provided through a combination of fencing and landscape materials, as determined by the County through the review and approval of the landscape and screening plan. The screening and landscaping plan shall be designed to provide compatibility with the future development of the area. This plan shall serve as the interim restoration plan, and it shall be implemented by the applicant within 90 days of completion of the construction of the final well, if all twenty approved wells are drilled and completed at the same time. If applicant staggers well completion (i.e., completes a lesser number of wells initially with plans to complete the remaining wells at a future date), then the interim restoration plan shall be implemented within 90 days of completion of the initial set of wells.
3. Prior to initiation of construction, the applicant shall provide the applicable title commitment documents to Adams County for review of the easement rights necessary to construct the oil, water, and gas pipelines for the facility.
4. The applicant shall obtain all required access permits and oversized load permits from Adams County.
5. The applicant shall receive a "Notice to Proceed" from the Department of Community and Economic Development. Written proof that all of the conditions precedent have been satisfied shall be required prior to receiving this notice.

Conditions:

1. The approved traffic route for this permit is the site access road to 132<sup>nd</sup> Avenue, 132<sup>nd</sup> Avenue to Buckley Road, Buckley Road to 136<sup>th</sup> Avenue, and 136<sup>th</sup> Avenue to Interstate 76. This route is depicted in the site plan submitted with this application. All traffic activities associated with this site shall utilize the approved traffic route and any modification shall require an amendment to the AUSR permit.
2. Prior to initiation of production, the applicant will submit to the county written certification that the facility is connected to a pipeline for the transfer of product off-site.
3. Applicant shall implement the best management practices as identified in the Sound Impact Assessment provided as part of the application and provided in exhibit 2.4.
4. Maintenance of required landscaping and fencing shall be in compliance with the Adams County Development Standards and Regulations at all times.

5. As referenced in 8(c.) of the Extraction Oil & Gas/Adams County MOU, the applicant agrees to conduct a baseline test of any registered water well requested by the owner, on a one-time basis, if such well is within a ½ mile radius of the new oil and gas facility.
6. The access road to this site shall be outfitted with a vehicle tracking pad.
7. The applicant shall be responsible for the cleanliness and safety of all roadways adjacent to this site. If at any time, these roadways are found to be dangerous, not passable due to debris or mud, or found to be a nuisance due to tracking of sediment or other debris, Adams County will shut down the project until the roadway conditions have improved and are deemed acceptable. If the contractor/applicant fails to keep the adjacent roadways clean and free from debris, the County has the option to do the required clean up and bill the charges directly to the applicant, Extraction Oil & Gas.
8. Noise levels during the construction, drilling, completions, and production life-cycles shall not exceed those outlined in COGCC Section 802.
9. Per Section 14 of the executed MOU, fresh water as referenced in the COGCC's rules and Regulations, or another source as approved by the County on a case by case basis, may be applied to roads and land surfaces for purpose of dust mitigation. Absolutely no other liquid or substance generated by the production of the operator's facility, including, but not limited to, exploration and production waste (as defined by the COGCC) or any other application of liquids that would have negative impact to natural resources, shall be permitted to be applied to roads and land surfaces.
10. Financial assurance shall meet or exceed the requirements of COGCC 700 Series Rules Financial Assurance and Oil and Gas Conservation and Environmental Response Fund.
11. A closed loop system will be used, as depicted in the permit application.
12. Per Section 5 of the executed MOU, in an effort to reduce truck traffic, where feasible, the Operator will identify a water source lawfully available for industrial use, including oil and gas development, close to the facility location, to be utilized by Operator and its suppliers. Operator will comply with the Colorado Department of Public Health and Environment requirements and Tri-County Health Department (TCHD) regulations concerning water quality. With respect to wastewater treatment, Operator agrees to comply with TCHD's Regulations NO O-14, On-site Wastewater Treatment Systems, as adopted or modified. The Operator agrees to contact TCHD in a timely manner to arrange for the processing of appropriate application matters as required inspections.

13. Per COGCC Section 604.c (4) B. IV. Zero Flaring or venting of gas upon completion of flowback, excepting upset or emergency, or with prior written approval from the COGCC Director for necessary maintenance operations.
  - a. The applicant shall provide a copy of written COGCC Director approval to the CEDD Director within 24 hours of flaring operations and/or approval, whichever occurs first.
14. Upon conclusion of construction, drilling, and completion, the site shall be fenced according to the Adams County Development Standards and Regulations Section 4-10-01-03. The fence shall contain a gate and the gate shall remain closed and locked when the well pad and associated facilities are not in use.
  - a. The local fire district shall have access to ALL gate key(s)/combination(s) at all times for use in case of emergency.
  - b. Adams County oil & gas inspector shall have access to ALL gate key(s)/combination(s) at all times for use in case of emergency.
15. Applicant is required to receive an approved waiver of responsibility/completion of reclamation from Adams County upon abandonment and reclamation of well pad and associated facilities.
16. Well pad, associated facilities, and access road shall be free of any county and state identified noxious weeds throughout the drilling, completion and production portions of operations.
17. A tabletop exercise pertaining to the Emergency Response Plan will be required. This may be requested by the County's Local Government Designee, Emergency Manager, Local Emergency Planning Commission, Sherriff's Office, site-specific Fire District, or Transportation Department.
18. All representations and commitments of the applicant made during the AUSR process are incorporated herein as conditions of approval.

Based on the criteria for Approval outlined in Section 4-10-02-05-02 of the County's Development Standards and Regulations, the Director officially issues an **Approval of the request.**



Kristin Sullivan, AICP  
Director, Community & Economic Development

