

Christopher LaMere

From: Jen Rutter
Sent: Thursday, August 17, 2017 3:57 PM
To: Christopher LaMere
Subject: FW: HRM RESOURCES II - ADCO - PC PAD AUSR RESPONSE
Attachments: HRM - ADCO PC PAD AUSR Response 06222017.pdf



Jen Rutter

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From: Dan Kelly [<mailto:dkelly@hrmres.com>]
Sent: Thursday, June 22, 2017 11:04 AM
To: Christopher LaMere; Jen Rutter
Cc: derek.petrie@iptenergyservices.com
Subject: HRM RESOURCES II - ADCO - PC PAD AUSR RESPONSE

Good Morning Mr. LaMere and Ms. Rutter,

HRM Resources II (HRM) and its consultants have completed a careful review of the comments received on the PC PAD AUSR from Adams County, the City of Brighton, Tri-County Health Department, other agencies, and the public. The packet that accompanies this e-mail represents HRM's response to those comments.

Many of HRM's responses to comments are captured in the table provided by the County (which is attached). However, HRM's review of comments also prompted changes in the proposed operation plan and the transportation plan. In those cases, we are submitting additional materials to supplement the AUSR permit application as part of HRM's response to comments on those issues.

Of perhaps most importance, in response to comments from the County and others, and after careful review, HRM has decided to reduce the well count at the PC Pad from 20 to 16, along with a corresponding reduction in the other equipment at the site. By doing so, HRM will also reduce the site footprint and the extent of surface disturbance. We anticipate these changes will significantly mitigate the concerns expressed by various parties in their review of the AUSR.

As now contemplated, the onsite surface production facilities will consist of 16 wellhead manifolds, 16 separators, 14 oil tanks, 2 produced water tanks for a total of 16 tanks), 2 vapor recovery towers, 8 combustors, 2 generators, 2 scrubbers, 6 vapor recovery units, 1 gas sale line and one LACT unit. Future equipment could include an oil sales line and 3 gas lift compressors. The entire location will be fenced with secure access following the conclusion of completion activities.

To reflect these changes in the operational plan for the PC Pad, I also am enclosing with this e-mail a revised location drawing, a site plan showing the surrounding area, and site plan layout locations. I also am enclosing a graphic showing facility layout with perimeter landscaping. These graphic depictions reflect the revised operational plan for the PC Pad and supplement the corresponding materials included with the AUSR application.

Also attached with this e-mail is an Emergency Preparedness Plan that has been revised in response to comments from Adams County Emergency Management.

In response to comments from the County about truck traffic impacts to East 132nd Avenue and Buckley Road, HRM commissioned an evaluation from Arcadis of truck traffic impacts, which is also attached. Arcadis conducted a baseline traffic survey, reviewed trip generation data for 16 wells, and converted traffic volume, truck size, and weight information from the baseline traffic count and the PC Pad development profile into traffic loading expectations over time. Arcadis concluded that the existing roads should be sufficient to support baseline traffic as well as the PC Pad traffic. HRM believes the Arcadis report demonstrates the existing road system's capacity to handle development and completion activities at the PC Pad. However, HRM understands the County's concerns about potential traffic impacts. In response to those concerns, ***HRM will agree to a voluntary road impact mitigation fee of \$2,000 per well, or a total of \$32,000, payable at the time the first well is spud at the PC Pad.***

In addition, HRM is prepared to enter into a road maintenance agreement with the County. A proposed road maintenance agreement is attached with this e-mail.

HRM has responded thoughtfully to the County's comments as well as those of others who have participated in this process. We appreciate your hard work and patience, and we look forward to completing this process.

Respectfully,
Dan Kelly