

**Adams County  
Community and Economic Development Department  
Development Review Comments**

**Case Number: USR2017-00005**

**Case Name: Edmundson**

**Applicant: Ward Petroleum**

**Date Initiated: 11/16/17**

Referral Comment No.	Mapped?	Reviewer Initials	County Comment	Applicant Response (date)
1	City of Brighton (Matt Sura)	CL	Staff has reviewed comments and is evaluating how Conditionals of Approval (COAs) may be used to mitigate impacts.	<ol style="list-style-type: none"> <li>1. LOCATION:               <ol style="list-style-type: none"> <li>a. This Floodplain Use Permit Narrative has been prepared on behalf of Ward Petroleum for the proposed Edmundson Pad Project located in Adams County, Colorado. Some of the proposed Project is located within the 100-year floodplain of Third Creek. A regulatory compliance program consistent with County and FEMA standards has been prepared and submitted to Adams County.</li> <li>b. The location itself is not within the Brighton City limits and instead located in unincorporated Adams County Zoned Agricultural-3 (A-3). Brighton's Comprehensive Plan is not applicable to a location such as the Edmundson which is within unincorporated Adams County. The location is compatible with Agricultural-3 land use as identified by Adams County.</li> <li>c. It is not feasible to consolidate pads because 1) each operator and the associated location have spacing units which necessitate these pads for accessing the mineral estate in a legal manner; 2) it is not reasonable to expect all companies to operate the same; each will typically have their own operating and safety requirements and designs which could would present significant logistical challenges for large consolidated pads; 3) once the wells are drilled and completed, interim reclamation will be conducted and the footprint of this site will be reduced.</li> </ol> </li> <li>2. WATER QUALITY: Ward Petroleum is aware of COGCC Order 1-189 applicable to Brighton's Public Water System Protection Area. Ward Petroleum will meet all aspects of the Order 1-189 including groundwater sampling and associated BMP's of the Order for this project. The 2A has already been</li> </ol>

				<p>submitted. COGCC will place the Brighton Public Water System Protection Area requirements as a Condition of Approval.</p> <p>3. TRANSPORTATION:</p> <ul style="list-style-type: none"><li>a. The road will be designed to support an imposed load of 75,000 pounds.</li><li>b. The road design specifications (width and aggregate material) suggested by Brighton can be met for this project. Grading, drainage from the roadway surface and culvert installation will meet the requirements of Adams County.</li><li>c. Ward strives to keep roadways free of ruts and will do so for this project.</li><li>d. Water necessary for drilling and hydraulic fracturing will be piped to the location from a yet to be identified source. If the source is owned by the City of Brighton, prior approval will be obtained.</li><li>e. Traction chains from heavy equipment shall be removed before entering any City of Brighton maintained street or right-of-way.</li><li>f. Ward will take all practicable measures to ensure that vehicles do not track mud or debris onto City streets and rights-of-way. If mud or debris is deposited on City streets due to activities associated with Ward Petroleum, the streets shall be cleaned as soon as practicable.</li></ul> <p>A comment is made that the access road map with the application is too old and does not identify E-470. A revised Access Road Map showing E470 was submitted to COGCC per their request as a result of Brighton's comment.</p> <p>A comment is made that Ward is proposing an "impossible route" from 132<sup>nd</sup> Avenue to Highway 85. Traffic will utilize US-85 and I-76 to supply the pad, mainly from Hudson, Brighton, and Commerce City. Access will be via Buckley Road and 136th Avenue, avoiding turns at the 136th and Sable intersection. It is anticipated that trucks will be routed to the location from I-76 on the east, exiting at 136th Avenue, and then taking Buckley Road south to 132nd Avenue. Trucks may also be routed via US-85 to 136th Avenue, turning south at Buckley Road, then reaching the location via 132nd Avenue. The route referenced as "impossible" is not mentioned in the application material or the Transportation Impact Study filed by Ward Petroleum.</p>
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2	CDPHE (Kent Custer)			Ward will comply with applicable requirements of the Colorado Department of Public Health and Environment.
3	XCEL Energy			Ward will call the Utility Notification Center prior to any construction.
4	Tri-County Health			<p>Domestic Wastewater Management Ward will obtain OWTS permits for domestic waste water as required by TCHD.</p> <p>Baseline Water Quality Testing Ward will conduct baseline water sampling required by COGCC Rule 609 and the Memorandum of Understanding with Adams County. Ward has already identified the water wells which can be tested. Owners of those wells will be contacted for sampling.</p> <p>Water Supply for Use by Workers Ward will submit information regarding the source of water for workers as well as any proposed potable water system to the County and TCHD. If the drinking water is hauled, a public water system identification number for the water hauler will be provided to TCHD.</p> <p>Potential Temporary Water Storage Any Non-potable water storage tank will be labeled as such. Ward typically utilizes temporary above-ground piping to deliver water to the site for use in drilling and completion without the need for very large storage tanks. If a large storage tank was used, it would be constructed to manufacturer's specifications.</p> <p>Above Ground Storage Tanks All permanent above ground storage tanks will be placed within secondary containment using a metal berm to hold 150% of the largest tank plus an allowance for precipitation. A liner is also installed below the tanks and is connected to the metal berm to prevent subsurface impact from a leak or spill.</p> <p>Emergency Response Plan/Spill Reporting Ward has prepared an Emergency Preparedness Plan with input from local fire districts and Adams County 12 School District. Procedures to follow in the event of a spill are also included.</p> <p>Air Quality Permitting Ward Petroleum will comply with all air quality requirements of the Colorado Department of Public Health and Environment.</p> <p>Dust Control and Mitigation Stormwater related best management practices will be</p>

				<p>used onsite to control erosion and sedimentation as outlined in the Storm-water Management Plan (SWMP) submitted to the county for this project. Dust will be controlled during construction with the use of applying fresh water as needed. Interim reclamation will be conducted as required by the COGCC.</p> <p>Traffic Safety Ward works with the school districts to identify school bus routes along proposed traffic routes to avoid periods when school buses are in use.</p>
5	Adams County Staff			<p>a. Engineer Review: ENG1- The site plan for the floodplain use permit will be prepared to show the final topography of the new well pad as well as a cross section of the well pad. The drawing will show the base flood elevations and the elevation of the ground, concrete pads, and proposed equipment. ENG2 – Ward will submit documentation showing the schedule for installation and the location of the pipeline. The applicant will provide an approved agreement confirming an arrangement with the company installing and operating the pipeline.</p> <p>b. Environmental Analyst: The current landscape plan incorporates a vegetative cover along the south side of the location. In addition, a drainage plan for the site will be developed to mitigate impacts to the floodplain.</p> <p>c. Local Government Designee: LGD1: Ward is planning to have pipeline installed to transport oil and natural gas from the site. LGD2: As specified in the MOU between Ward and Adams County, sampling of residential water wells located ½ mile from the well pad site will be conducted. LGD3: Ward can restrict truck traffic during certain hours (evening hours 7:00 pm to 7:00 am), but caveats must be made for emergency or critical deliveries necessary to maintain operations during drilling and completion operations. LGD4: Truck traffic during pad and well construction may generate excessive dust. Ward will gravel the first 1500 feet of the access road surface to minimize dust and will use fresh water to control dust as needed. LGD5: Ward will coordinate with school district 27J regarding any school bus routes which are along the access route to the site.</p>

				<p>Planning/ Landscape</p> <p>(a) The landscape plan will be revised to include the overall landscape area in square feet using a table format including the required site area (sf) and the provided landscape area (sf).</p> <p>(b) The landscape plan will include the proposed fence elevation.</p> <p>(c) The landscape plan will be revised to identify proposed landscape buffer widths which will be placed in a table format.</p> <p>(d) The landscape plan will be revised to include language from Section 4-16-11, Maintenance Standards.</p> <p>(e) The landscape plan will be revised to close the gap in the landscape perimeter on the west side of the site plan.</p> <p>(f) Placing the location and proposed irrigation water tank on the landscaping plan would be premature at this stage. The landscape company selected to plant the trees, vegetation and install the irrigation system will be proposing the actual location during the bidding process which will occur at a later date.</p>