COMMUNITY AND ECONOMIC DEVELOPMENT DEPARTMENT

STAFF REPORT

Administrative Review Memo **January 17, 2019**

CASE No.: **USR2018-00008**	CASE NAME: **PetroShare – State**

Owner's Name:	PetroShare Corporation
Applicant's Name:	PetroShare Corporation
Applicant's Address:	9635 Maroon Circle, Suite 400, Englewood, CO 80112
Location of Request:	14810 Powhaton Road Parcel number 0156715400001
Nature of Request:	A Use by Special Review Permit to allow up to sixteen (16) horizontal wells and one (1) production facility on one (1) well pad for the production of oil and gas.
Zone District:	Agriculture - 3 (A-3)
Site Size:	Approximately 6.3 acres (480-acre parcel)
Proposed Uses:	Multi-well pad for the production of oil and gas
Existing Use:	Agricultural with four (4) active vertical oil and gas wells
Report Date:	January 17, 2019
Case Manager:	Christine Dougherty
Director Options:	Approval with 4 Findings of Fact, 4 Conditions Precedent, and 19 Conditions; Denial; or Referral to the Board of County Commissioners
Staff Recommendation:	Approval with 4 Findings of Fact, 4 Conditions Precedent, and 19 Conditions

SUMMARY OF APPLICATION

Background:

PetroShare Corporation (PetroShare), the applicant, engages in exploration and development of oil and natural gas, primarily in the Denver-Julesburg Basin. The applicant has proposed an oil and gas well pad location in unincorporated Adams County. The proposed project, PetroShare State, consists of the construction of one well pad with up to sixteen (16) horizontal wells, equipment, production facility, and one access road.

The proposed well pad location is on a 480-acre parcel, southeast of the intersection of East 152nd Avenue and Powhaton Road. Access to the site is proposed to be from East 152nd Avenue,

located on the northern boundary of the property. Surrounding land uses are agricultural in nature on parcels thirty-five (35) acres or greater, with single-family homes. Conventional oil and gas wells are present on several parcels in the area.

Summary of Application:

The project proposed by PetroShare consists of sixteen (16) wells and one (1) production facility on a single well pad, with one (1) access road to accommodate all traffic during construction, production, and long-term maintenance. The project is has three primary phases: construction, drilling/completions, and production. Construction of the well pad may take up to three (3) weeks to complete. The drilling period is expected to last up to twelve (12) days per well, and up to an additional ten (10) days for completions, totaling up to twenty-two (22) days per well.

The pad size during the drilling and completion phases will be approximately six and three tenths (6.3) acres. After the completions phase, the site will undergo interim restoration, during which the area of the facility will be reduced to three and one half (3.5) acres. During interim restoration, landscaping will be installed to reduce the overall visual impacts of the facility. Final reclamation will occur when the wells are plugged and abandoned.

The equipment, which will remain on site during the production phase, includes two (2) oil tanks, two (2) produced water tanks, four (4) separators, one (1) Vapor Recovery Unit (VRU), one (1) Volatile Organic Compound (VOC) combustor, and one (1) Lease Custody Transfer (LACT) Unit.

The mitigation measures that have been proposed by PetroShare include the following:

- **Planning:** PetroShare is pursuing an Oil and Gas Location Assessment permit (Form 2A) for a multi well pad through the Colorado Oil and Gas Conservation Commission (COGCC). This will eliminate the need for multiple single well pads, which would spread out the impacts over more surface area increasing the overall footprint of the project.

- **Pipelines:** PetroShare intends to construct and utilize pipelines to transfer oil and gas off site in place of onsite storage of the product. This will greatly reduce truck traffic in and out of the location for the lifetime of the well. The utilization of pipelines also ensures a safer operation as it greatly reduces the number of tanks that are required on location.

- **Noise:** An ambient sound study was completed for the proposed facility and resulted in recommendations to mitigate noise impacts. The operator will construct a thirty-two (32) foot tall temporary sound wall along the edge of the site and an additional sixteen (16) foot wall may also be constructed around the generators to ensure compliance.

- **Odor Mitigation:** During drilling operations, a closed loop system will be used, reducing odor emissions. PetroShare will also utilize a Volatile Organic Compound combustor to reduce emissions.

- **Visual Mitigation:** When implemented, sound walls will reduce visual impacts during the drilling and completion phases and landscaping will reduce visual impacts during the production phase. In addition, pursuant to COGCC Rule 804, the tank battery will be painted in uniform, non-contrasting, non-reflective color tones with the colors matched to but slightly darker than the surrounding landscape.

- **Landscaping:** PetroShare will adhere to all Adams County requirements and/or surface owner requests, including minimizing impacts to native vegetation. Landscaping, serving as interim restoration, will consist of a perimeter fence bordered with a mixture of native grasses, shrubs, and plants along the perimeter of the facility to reduce visual impacts. Final reclamation will consist of removing all equipment and landscaping, returning the area to pre-disturbance conditions.

Development Standards and Regulations Requirements:

In order to obtain an Administrative Use by Special Review approval, an Oil and Gas Facility must satisfy certain criteria.

1. Memorandum of Understanding (MOU)

PetroShare signed the standard County MOU, which was executed by Adams County Board of County Commissioners on March 22, 2016.

2. Satisfy Submittal Requirements

The applicant has satisfied all required submittal items as outlined in the Development Standards and Regulations. These include:

- Conceptual Review Meeting – PetroShare attended a Conceptual Review Meeting with the Adams County Development Review Team to discuss their proposed site on April 2, 2018.

- Neighborhood Meeting – PetroShare notified property owners within one-half mile of the parcel boundary of the proposed oil and gas facility and invited them to an open house neighborhood meeting where residents could ask the applicant questions directly. The Neighborhood Meeting was held on May 17, 2018, at the Flatrock Regional Training Center located at 23600 East 128th Avenue. At the meeting, PetroShare provided an overview of the project, operation timeline, and proposed mitigation measures outlined in this report.

- Application Form and Fees – PetroShare submitted the required applications and paid the applicable permit fees. A traffic impact fee will be assessed consistent with the application and the Oil and Gas Traffic Impact Fee Schedule. The operator may also be required to obtain a Right-of-Way permit, Access Permit, and/or an Oversize Load Permit before starting construction activities.

- Oil and Gas Operations Plan – PetroShare submitted an Oil and Gas Operations Plan, an Impact Area Map showing all oil and gas wells and water wells within one half mile, a Drilling Operation Plan, a Production Plan, and a Sign Plan.

- Emergency Preparedness Plan – The applicant submitted a site-specific Emergency Preparedness Plan that has been reviewed and approved by the Adams County Office of Emergency Management.

- Engineering Documents – PetroShare provided a Grading, Erosion, and Sediment Control Report & Plan, as well as a Traffic Impact Plan, in accordance with the Development Standards and Regulations.

- Surface Owner Documentation – PetroShare provided a Memorandum of Surface Use Agreement to show the proposed oil and gas facility is authorized by the surface owner.

3. Compatibility / Land Use Impacts

The subject site is approximately four hundred and eighty (480) acres, of which six and three-tenths (6.3) acres is proposed to be used for the development of a sixteen (16) well oil and gas well pad, associated production facility, and access road. Currently, the parcel is occupied with four existing vertical oil and gas wells. Three of the existing wells are owned by PetroShare and have been shut-in, the fourth well is owned by Kerr McGee and is currently producing. Once the proposed wells begin production, PetroShare plans to plug and abandon the three existing wells they own.

The parcel is bordered on all sides by Agriculture 3 (A-3) zoned parcels. The purpose of the Agricultural-3 District is to provide land primarily in holdings of at least thirty-five (35) acres for dryland or irrigated farming, pasturage, or other related food production uses; a maximum of one residential structure is permitted.

According to the Adams County Comprehensive Plan, the future land use designation for this parcel is Agricultural. The Agricultural designation is intended for areas that are not expected to develop, except for limited areas of very low residential density of one (1) dwelling per thirty-five (35) acres. Secondary uses for this designation may include open space, and other non-urban uses incidental to agriculture. Multi-well oil and gas facilities can provide alternative means of income for landowners while preserving the agricultural uses of the land, which contributes the compatibility of this use.

Industrial impacts inherent to large-scale oil and gas development require mitigation from residential and commercial development. Taking into consideration the compatibility requirements of the Adams County Development Standards and Regulations, PetroShare has agreed to connect the facility to the Boardwalk Pipeline (RCU2016-00016), located parallel Powhaton Road, for the transportation of oil and gas products from the facility. Connection to this pipeline will allow for a reduction of onsite storage tanks and overall truck volume accessing the site during the production phase. Additional mitigation measures include the use of a sound

wall to reduce noise and visual impacts during the drilling and completions phase, as well as the implementation of landscaping, which will reduce long-term visual impacts.

The Boardwalk Pipeline was presented to the Adams County Planning Commission on November 10, 2016. A recommendation of approval was forwarded to the Board of County Commissioners for a hearing on December 8, 2016. After approval, the pipeline was constructed and is currently in operation. Connection to the Boardwalk Pipeline will reduce truck traffic, reduce on-site storage, and reduce the facilities surface area, all of which supports compatibility with the current and planned future land uses in the area.

Existing land uses in the area include large tracts of dry and irrigated farmland, and residentially occupied A-3 zoned parcels of thirty five (35) acres or greater. The applicant has thoughtfully considered the impacts to the surrounding properties, future land use, and local roadways. These have been mitigated through a combination of site planning decisions, traffic and access management, utilization of a pipeline for all products, and long-term compatibility is addressed through the requirement for reclamation upon conclusion of surface operations. It is staff's recommendation that this criterion has been satisfied by the applicant's proposal, and through the recommended conditions of approval within this staff report.

4. Emergency Service Providers

The applicant provided the required 'will serve' letter from the Brighton Fire District, the emergency service provider for that area.

Staff Recommendation:

Based upon the application, the criteria for an Administrative Use by Special Review permit, and a recent site visit, staff recommends approval of this request with 4 findings-of-fact, 4 conditions precedent, and 19 conditions.

Findings of Fact:

1. The applicant and the County have executed a Memorandum of Understanding (MOU) that is currently in full force and effect, and the oil and gas facility is in compliance with the provisions of the MOU.

2. The applicant has satisfied the submittal requirements for an Administrative Use by Special Review application, as outlined in the Development Standards and Regulations.

3. Based upon compliance with the recommended conditions of approval, the oil and gas facility is compatible with the surrounding area and does not create any site specific or material impacts to nearby land uses.

4. The applicant has provided a commitment to serve the facility from the authority having jurisdiction for providing emergency services.

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 4-10-02-03-03-07-10 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. The applicant or the applicant's subcontractors may be required to obtain Oversize Load Permits, and/or Access Permits, and/or a Right-of-Way Construction Permit. These permits may be obtained through the Adams County One-Stop permit center.

3. A traffic impact fee in the amount of $314,721 for the construction and production of sixteen (16) oil and gas wells using fresh water and product pipelines is due prior to ground disturbing activities.

4. The applicant shall receive a "Notice to Proceed" from the Department of Community and Economic Development. Written proof that all of the conditions precedents have been satisfied shall be required prior to receiving this notice.

Conditions:

1. The approved traffic route for travelling to and from the site will be as follows:
    a. Primary travel to and from the well pad site:
        i. From the access road to East 152nd Avenue,
        ii. West on East 152nd Avenue to I-76,
    b. Primary travel for disposal of cuttings:
        i. From the access road to East 152nd Avenue,
        ii. West on East 152nd Avenue to Powhaton Road,
        iii. South on Powhaton Road to East 120th Avenue,
        iv. West on East 120th Avenue to Tower Road,
        v. South on Tower Road to Tower Road Landfill.

2. The applicant shall implement the best management practices as identified in the Ambient Sound Study provided as part of the application and provided in Exhibit 2.3 (Ambient Sound Study). These mitigation measures include 32-foot high sound walls around the perimeter of the site, and 16-foot sound walls as needed around the equipment within the site during drilling and hydraulic fracturing (completion) operations. Noise

levels during the construction, drilling, completions, and production life cycles shall not exceed those outlined in COGCC Section 802.

3. The applicant shall submit written certification that the facility is connected to a pipeline for the transfer of product off-site prior to the initiation of production.

4. The applicant has submitted a landscaping and screening plan for the site, which has been 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. This plan shall serve as the interim restoration plan and it shall be implemented by the applicant within 90 days of completion of the final well, if all sixteen (16) approved wells are drilled and completed at the same time. If the applicant develops the facility in phases (i.e., completes a lesser number of wells initially with plans to drill and complete additional wells at a future date), then the interim restoration plan shall be implemented within 90 days of completion of the initial set of wells.

5. If requested by the surface owner, or practicable for site security, 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.

6. Maintenance of required landscaping and fencing shall comply with the Adams County Development Standards and Regulations at all times.

7. 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.

8. 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.

9. As referenced in 8(c.) of the PetroShare/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.

10. PetroShare is required to provide notice to parcel owners and occupants located within a one-half mile radius of the parcel boundary on which the well pad is located at least 14 days prior to the commencement of any drilling or completions operations.

11. 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.

12. 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.

13. Upon request by the County's Local Government Designee, Emergency Manager, Local Emergency Planning Commission, Sherriff's Office, site-specific Fire District, or Transportation Department, a tabletop exercise pertaining to the Emergency Response Plan will be required.

14. All permanent lighting shall be directed downward and internally. Temporary lighting shall conform to COGCC Rule 803 and not adversely affect adjacent residential properties. Any complaints regarding lighting shall be communicated to the Adams County Oil & Gas Inspector in order to ensure resolution.

15. PetroShare will construct the access road and any roadway improvements consistent with the County's regulations and at minimum be capable of supporting a 75,000-pound emergency response vehicle.

16. The applicant shall be responsible for the cleanliness and safety of all roadways adjacent to this site. If at any time, Adams County staff determines these roadways to be dangerous or not passable due to debris or mud, the applicant will cease use of the roadways until the roadway conditions have improved and are deemed acceptable by the County. If the contractor/applicant fails to keep the adjacent roadways clean and free from debris, Adams County has the option to complete the required clean up and bill the charges directly to the applicant, Great Western.

17. 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 and required inspections.

18. All representations and commitments of the applicant made during the AUSR process are incorporated herein as conditions of approval.

19. Provided at least one well is drilled and completed within a three (3) year period following the approval of this permit, such approval permanently vests the permitted location for the number of wells as contained within the initial permit approval. If additional wells are to be drilled following expiration of the initial three (3) year period, the permits for those wells shall be revised pursuant to the Development Standards and Regulations section 4-10-02-03-03-07-07(3).

CITIZEN COMMENTS

Of the three hundred and forty-three (343) referral notices sent to property owners and current residents located within one-half mile of the subject parcel boundary, one comment was received with no objections. The application and Request for Comments were also posted on the Adams County website for review by the public.

Referral Notifications Sent	Referral Comments Received
343	1

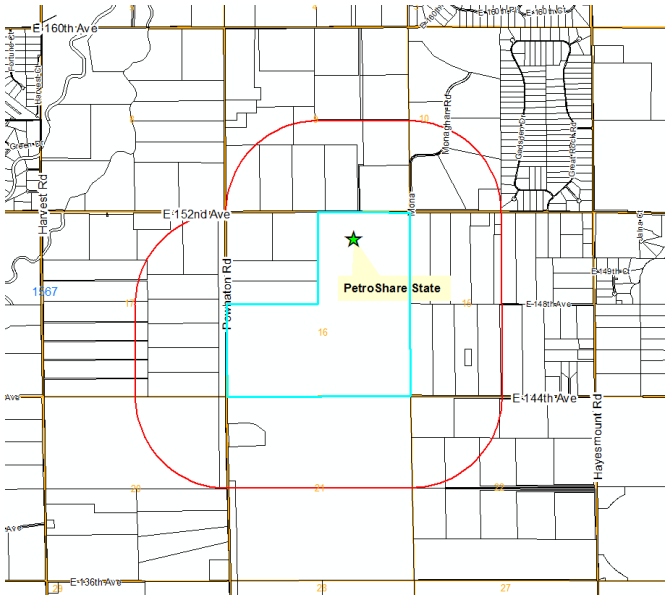


Figure 1. Map showing the ½ mile mailed referral radius from the parcel boundary.

COUNTY REFERRAL COMMENTS

The landscaping plans provided by the applicant were reviewed by staff and amendments were required. PetroShare has responded to the requested changes with a resubmittal of their landscape plans, which have been reviewed and approved by staff.

The case manager requested additional information about the water wells that were identified for obtaining baseline testing of the ground water. Additional information was also requested

concerning the required water source, produce water disposal, and information pertaining to the proposed pipelines. PetroShare has provided responses to the comments and inquires made by staff, and there are no outstanding items.

AGENCY REFERRAL COMMENTS

Responding with Concerns:

Brighton Fire and Rescue requested additional information such as coordinates for the site access, updating contact information, and a summary card for quick reference by emergency response personnel. The information and changes requested by Brighton Fire and Rescue have been provided by PetroShare in response to the comments received.

Colorado Parks and Wildlife (CPW) provided guidance on Best Management Practices when prairie dogs, raptors and /or migratory birds are present. CPW also provided guidance to minimize the spreading of noxious weeds. PetroShare has agreed to follow the guidance and recommendations provided.

The Tri-County Health Department (TCHD) provided guidance for the applicant concerning on-site wastewater treatment systems if they will be implemented, notification to water well permit holders and water rights holders located within an one-half mile radius, and request to review information regarding the source of water for workers. PetroShare has provided responses to all of TCHD's comments.

Colorado Department of Health and Environment (CDPHE) provided guidance on six (6) topics related to oil and gas development, including electrical equipment, odor mitigation, waste management, use of pipelines, flaring, and plugging and abandoning of the wells. PetroShare has reviewed the Best Management Practices, and have agreed to implement them where it is feasible and/or required.

Notified but not Responding / Considered a Favorable Response:
Adams County Office of Emergency Management
Adams County Sheriff's Office
Brighton School District 27J
United Power

Exhibits Table of Contents

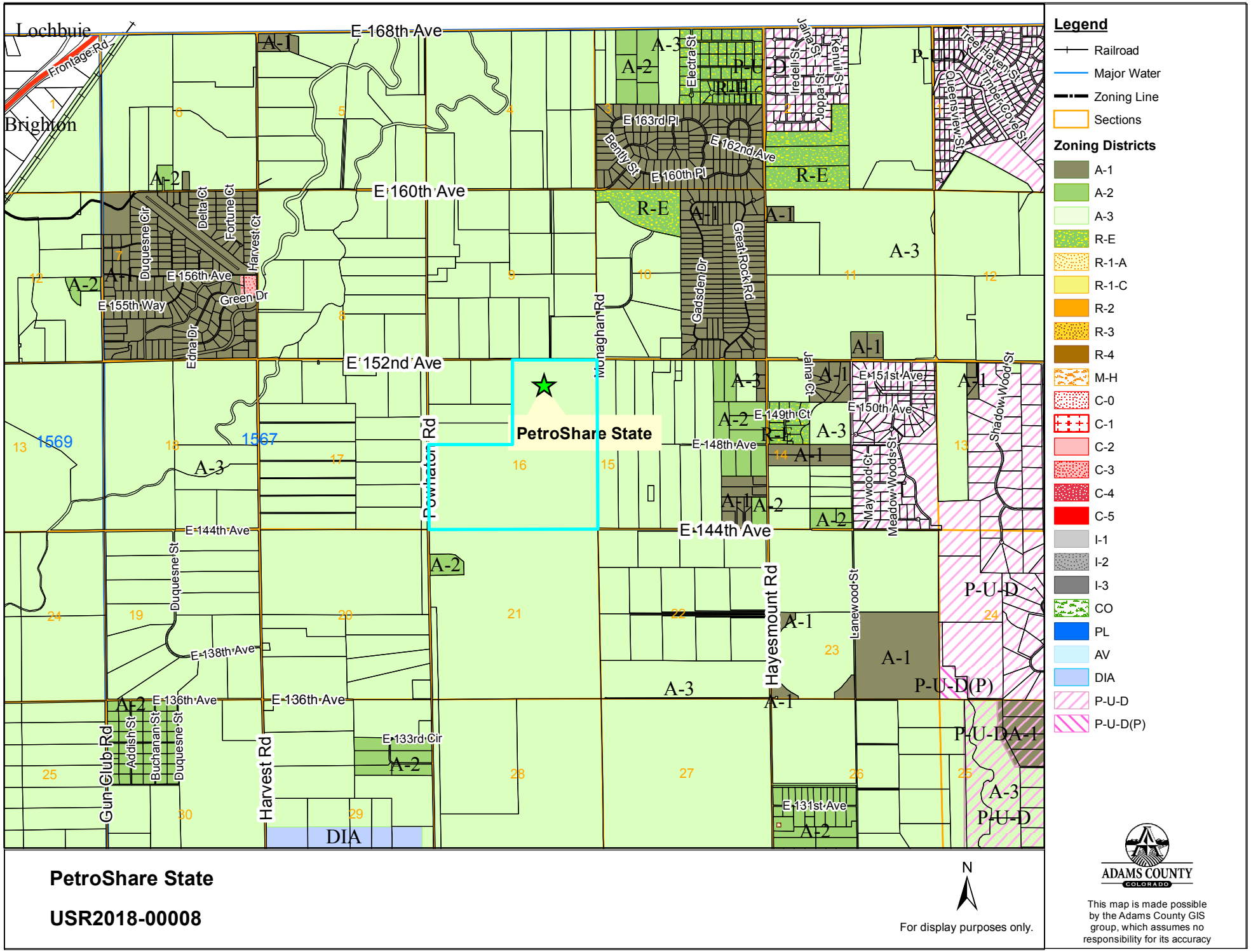
Exhibit 1- Maps
- 1.1 Zoning Map
- 1.2 Aerial Map
- 1.3 Simple Map
- 1.4 Comprehensive Plan Map

Exhibit 2- Applicant Information
- 2.1 Applicant Written Explanation
- 2.2 Applicant Site Plan
- 2.3 Ambient Sound Study
- 2.4 Traffic Impact Fee Schedule

Exhibit 3- Referral Comments
- 3.1 Requests for Comments
- 3.2 Comments Received
- 3.3 Applicant Response to Comments

Exhibit 4- Associated Case Materials
- 4.1 Notification Map
- 4.2 Notification Mailing Labels

EXHIBIT 1.1
ZONING MAP



PetroShare State

USR2018-00008

N

For display purposes only.

Legend

- Railroad
- Major Water
- Zoning Line
- Sections

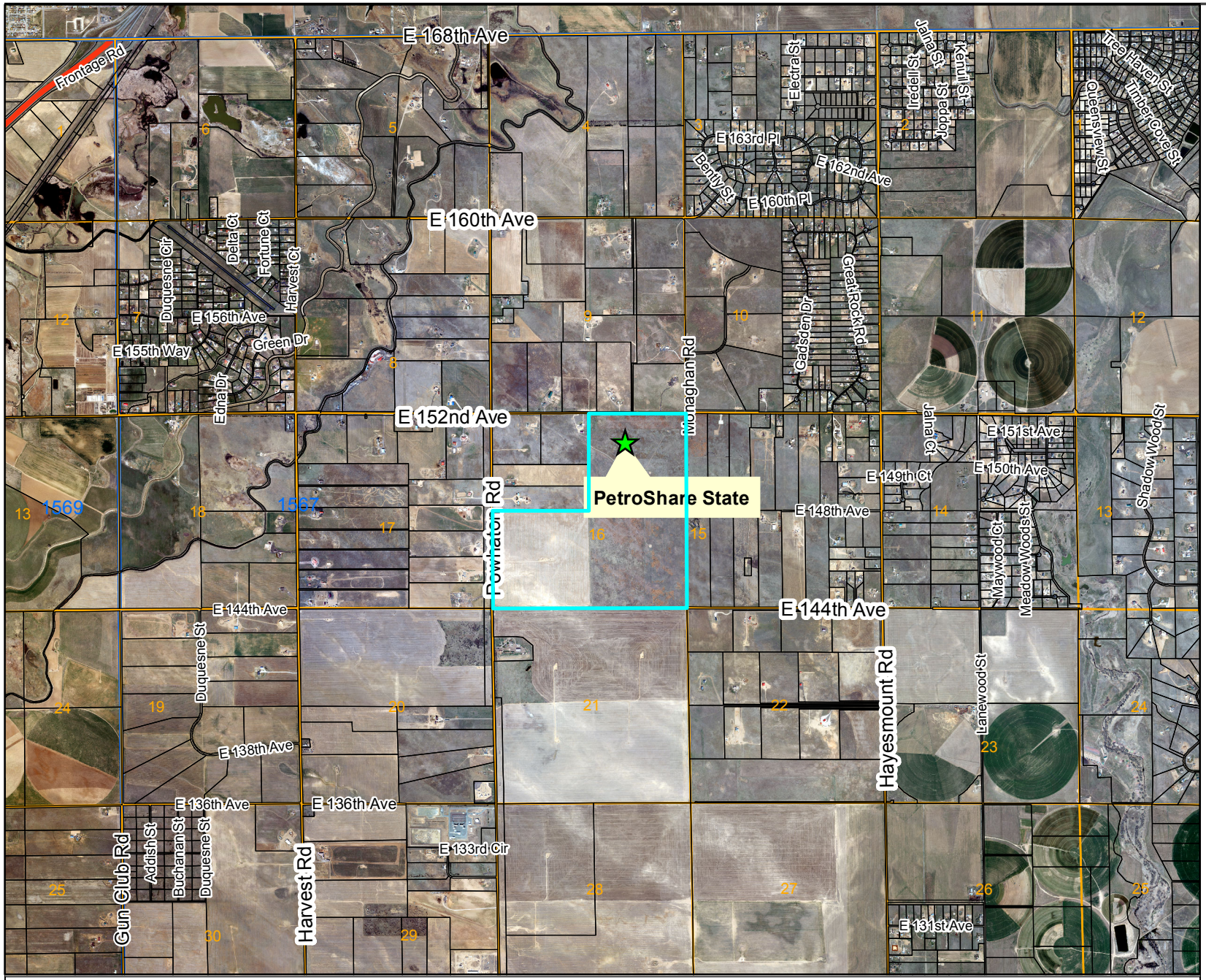
Zoning Districts

- A-1
- A-2
- A-3
- R-E
- R-1-A
- R-1-C
- R-2
- R-3
- R-4
- M-H
- C-0
- C-1
- C-2
- C-3
- C-4
- C-5
- I-1
- I-2
- I-3
- CO
- PL
- AV
- DIA
- P-U-D
- P-U-D(P)

ADAMS COUNTY
COLORADO

This map is made possible by the Adams County GIS group, which assumes no responsibility for its accuracy

EXHIBIT 1.2
AERIAL MAP



PetroShare State

USR2018-00008

N

For display purposes only.

Legend

- Railroad
- Major Water
- Zoning Line
- Sections

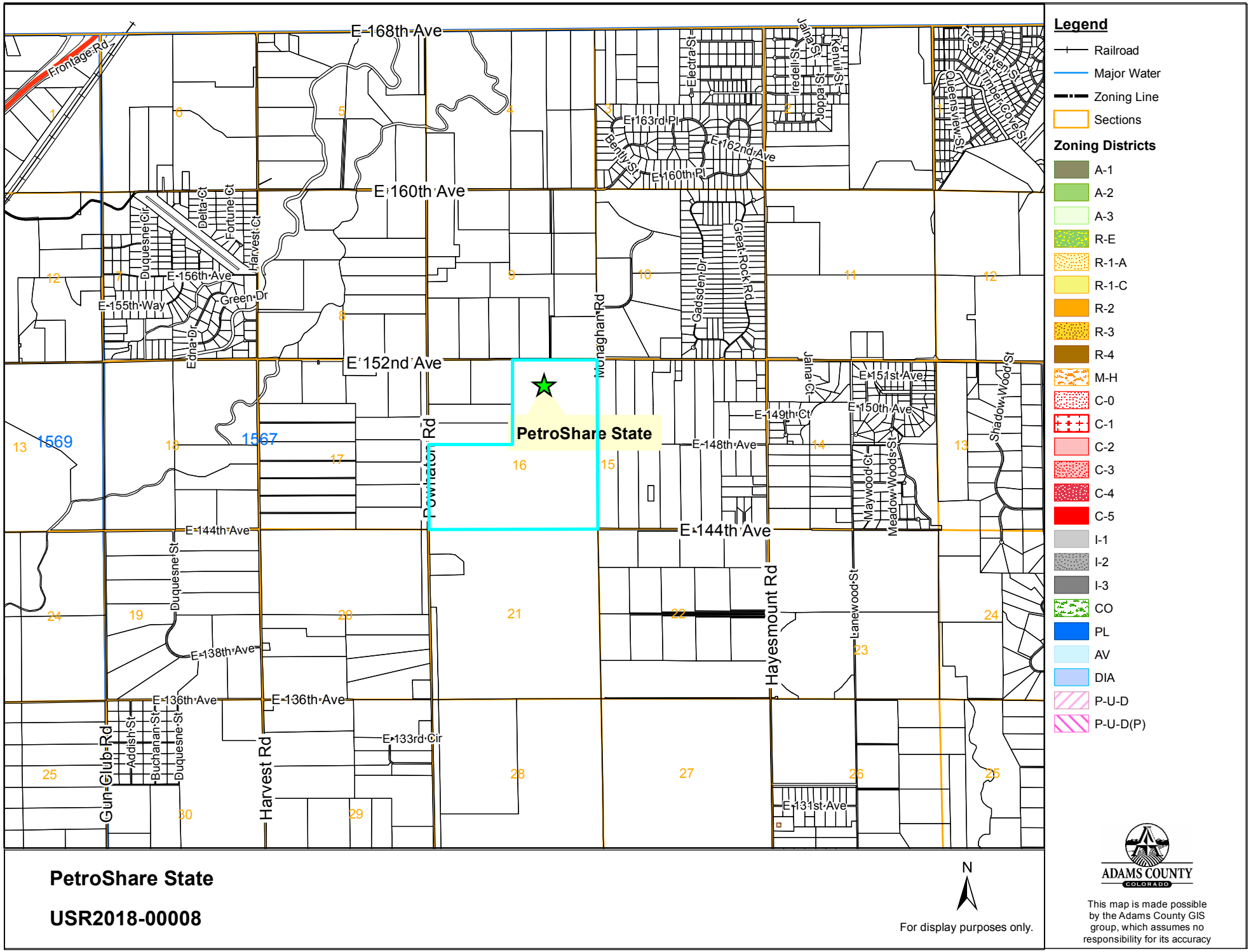
Zoning Districts

- A-1
- A-2
- A-3
- R-E
- R-1-A
- R-1-C
- R-2
- R-3
- R-4
- M-H
- C-0
- C-1
- C-2
- C-3
- C-4
- C-5
- I-1
- I-2
- I-3
- CO
- PL
- AV
- DIA
- P-U-D
- P-U-D(P)

ADAMS COUNTY
COLORADO

This map is made possible by the Adams County GIS group, which assumes no responsibility for its accuracy

EXHIBIT 1.3
SIMPLE MAP



PetroShare State

USR2018-00008

N

For display purposes only.

Legend

- Railroad
- Major Water
- Zoning Line
- Sections

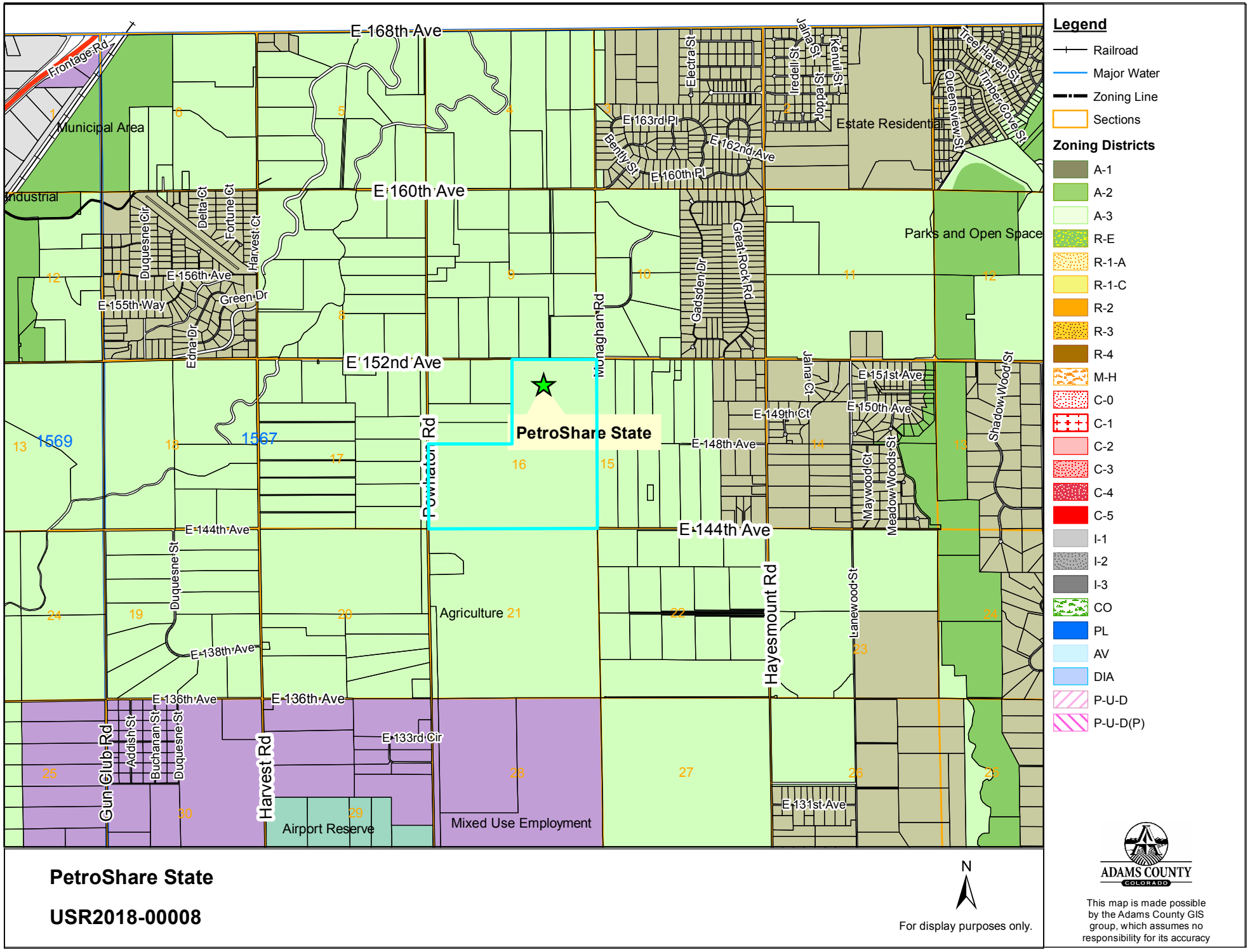
Zoning Districts

- A-1
- A-2
- A-3
- R-E
- R-1-A
- R-1-C
- R-2
- R-3
- R-4
- M-H
- C-0
- C-1
- C-2
- C-3
- C-4
- C-5
- I-1
- I-2
- I-3
- CO
- PL
- AV
- DIA
- P-U-D
- P-U-D(P)

ADAMS COUNTY
COLORADO

This map is made possible by the Adams County GIS group, which assumes no responsibility for its accuracy

EXHIBIT 1.4
COMPREHENSIVE PLAN MAP



Legend

- Railroad
- Major Water
- Zoning Line
- Sections

Zoning Districts

- A-1
- A-2
- A-3
- R-E
- R-1-A
- R-1-C
- R-2
- R-3
- R-4
- M-H
- C-0
- C-1
- C-2
- C-3
- C-4
- C-5
- I-1
- I-2
- I-3
- CO
- PL
- AV
- DIA
- P-U-D
- P-U-D(P)

PetroShare State

USR2018-00008

N

For display purposes only.

ADAMS COUNTY COLORADO

This map is made possible by the Adams County GIS group, which assumes no responsibility for its accuracy

EXHIBIT 2.1
APPLICANT WRITTEN EXPLANATION

PetroShare State 16-21 Wellpad
PetroShare Corporation
Section 16 Township 1 South Range 65 West (NW/4 NE/4)
Adams County, Colorado
Surface: State, Mineral Lease: State

Written Explanation

The proposed project consists of the construction of one (1) wellpad with up to sixteen (16) wells and one (1) access road for an oil and gas location to be operated by PetroShare Corp. (PetroShare). PetroShare does not intend to drill all 16 wells consecutively. The drilling schedule is subject to change due to economic conditions, business development priorities and equipment availability.

Sequence of Major Activities and Estimated Completion Date

Access Road and Wellpad:
Phase I-Pre-Drilling (14 - 21 days)
The existing access road will be upgraded and graveled to crown/ditch standards. Ripping and dozing will be done on the contour to prevent erosion while improving the road. There will be minimal traffic to the location during construction. Pad construction will be done simultaneously with road construction. The drilling rig will be moved onto the pad over the bladed road and drilling will begin. The private surface owner or good engineering practices (i.e. if a culvert is needed for drainage to prevent washout) will stipulate whether culverts will be installed at this point. A silt fence and/or ditch with catch ponds, and/or straw bales/waddles will surround the wellpad area during the drilling operations to prevent erosion. Site conditions may dictate alternate erosion control measures which will be chosen appropriately for current on-the-ground conditions. The access road will be graveled concurrently with wellpad completion.

Phase II-Drilling and Completion (Drilling: 7 – 12 days per well, Completion: 5 – 10 days per well)
After the drilling rig is moved out a truck mounted service rig will be moved in for well completion activities. Any additional operations including well stimulation will be performed at this point.

Final drainage design as designated or approved by the private surface owner will be implemented. Culverts, low water crossings, equipment installation, etc., will be done during this phase.

Phase III-Production
Well completion activities will be finished by this point and the well may be put online. Phase III can extend upwards of 40 years. There will be minimal vehicle traffic; 1-2 light trucks per day may travel the road to check well and maintenance. Depending on liquid production, a tanker truck may come to the site once every 1-30 days. Periodic downhole maintenance and repair will be done on an as needed basis.

Construction Standards

Access Road:

Access to the wellsite is 0.5 miles east on East 152nd Avenue from Powhaton Road. From there an access road will be constructed with the length of 0.1 miles south of East 152nd Ave with an additional access of 0.1 miles to the east to reach the wellsite. The access will have a running surface width to be 10'-12', with a maximum running road surface of 16', total distributed width to be no more than 40' for a length of approximately 325'. Depending on oil and gas production and exploration in the area per design or private surface owner, the access may be widened into a standard road with a 24' running surface.

If necessary, culverts will be installed prior to commencement of drilling operations. Drainage to consist of borrow ditches on both sides. Low water crossings are not anticipated. However, if necessary, low water crossings will be used during drilling, as conditions dictate and upon completion. Crossings will be upgraded with corrugated metal pipes and/or gravel-bottomed low water crossings. Culverts will be placed on grade and aligned with the natural channel bed. Culvert sizes will be a minimum of 18" diameter or as stipulated by private surface owner.

Construction materials will be obtained from available permitted sources, if needed, and consist of pit gravel.

Wellpad:

The proposed wellsite is anticipated to be 6.3 acres. Wellpad construction will commence approximately two (2) to five (5) weeks prior to the commencement of drilling operations. The size of location will be will have an interim reclamation size of 3.5 acres during the production phase.

The traveled portion of location will be gravel-surfaced prior to moving the drilling rig onsite. Site preparation will be done with standard excavation equipment using native materials. Additional surface material will be obtained from commercial sources or an approved borrow area. Salvaging and spreading topsoil will not be performed when the ground or topsoil is frozen or too wet to adequately support construction equipment. If such equipment creates ruts in excess of four (4) inches deep, the soil will be deemed too wet. In this case, all construction activities which may result in erosion will cease until the soil is deemed dry enough to resume activities.

Production facilities may vary according to the actual reservoir discovered and will be engineered upon completion of well tests. Production facilities will be clustered and placed away from cut/fill slopes to allow maximum recontouring of cut/fill slopes.

Onsite surface production facilities are anticipated to consist of a wellhead manifold, two oil tanks, four separators, two water tanks, one Vapor Recovery Unit, one Volatile Organic Compound (VOC) combustor and one Lease Automatic Custody Transfer (LACT) Unit.

Following the construction of the drill site and production facilities, an as-built diagram will be generated and retained onsite at all times.

Compliance Statement:

The PetroShare State 16-21 Wellpad complies with Section 4-10-02-05-02(3). PetroShare has worked diligently with the surface owner, in choosing the location that will have the least impacts the surrounding area, the environment and future development. PetroShare, in conjunction with the landowner, considered alternative locations on the parcel and concluded that the location chosen has the least economic impact on future potential uses such as agricultural crop land and/or development. Please see the Best Management Practices (BMPs) PetroShare will employ to reduce or eliminate impacts. BMPs may change at any time due to site conditions, enhanced knowledge and technology. The county will be advised if any significant or structural BMP changes. The location was chosen as the ideal site for the following reasons:

- PetroShare intends to construct and utilize pipelines to transfer water, oil and gas. This will greatly reduce truck traffic in and out of the location for the lifetime of the well. The utilization of pipelines also ensures a safer operation as it greatly reduces the number of tanks that are required on location.
- All tie-in pipeline will be covered under our existing SUA with the surface owner. Any easements needed to reach PetroShare Corp's tie-in location on the pad will be obtained by the pipeline company.
    - 1 Gas Line: a combination of 4", 6" and 8" 0.188 to 0.219 wall thickness, ARO coated, steel pipeline
    - 1 Oil Line: 4" 0.188 wall thickness, ARO coated, steel pipeline.
    - Pipe will start at the discharge of the last primary separation vessel and terminate at the sales point meter(s).

Proposed Mitigation Measures:

Planning

Development from existing well pads: PetroShare is permitting an Oil and Gas Location Assessment - Form 2A as a multi well pad through the COGCC. This will eliminate the need for multiple well pads which would ultimately require more surface disturbance.

Noise: PetroShare shall abide by COGCC rule 604.c.(2)A noise standards for all activities and provide and post 24-hour, 7 days a week contact information to address all noise complaints arising from the oil and gas facility. If needed, noise mitigation measures will be constructed along the edge of the oil and gas operation site to comply with sound limitation regulations set forth in COGCC rules.

Odor Mitigation: PetroShare will comply with COGCC Rule 805 and the Colorado Department of Public Health and Environment (CDPHE), Air Quality Control Commission, Regulation No. 2 Odor Emission, 5 C.C.R. 1001-4, Regulation No. 3 (5 C.C.R. 1001-5), and Regulation No. 7 Section XVII.B.1 (a-c) and Section XII. During drilling operations a Closed Loop System will be used, reducing odor emissions. PetroShare

intends to utilize pipelines to transport oil, gas and water, reducing the amount of onsite tanks to one (1). PetroShare will also utilize a VOC to reduce odor emissions.

Visual Mitigation: Pursuant to COGCC Rule 804, the tank battery shall be painted in uniform, non-contrasting, non-reflective color tones with the colors matched to but slightly darker than the surrounding landscape to limit evaporation and waste of liquid hydrocarbons.

Lighting: All lighting will be directed downward and internally. Temporary lighting shall conform to COGCC rules and regulation. No permanent lighting will be on the well site after the completion of drilling and completion operations.

Landscaping: PetroShare will adhere to all Adams County requirements and/or surface owner requests. Where feasible, native vegetation will be minimally impacted. Motorized equipment will be restricted to the wellsite and access road to the wellsite.

Weed Control and Management: PetroShare will manage weed control at the oil and gas facility and along the access road during construction, operations and until final abandonment and final reclamation is completed per Adams County and COGCC regulations.

Dust Mitigation: Fresh water, per COGCC rules, or another approved source will be applied to roads and land surfaces for purposes of dust mitigation as needed. No other liquid or substance generated by the production of the oil and gas facility will be applied to the road and land surface. The wellpad will be graveled, reducing dust pollution.

Erosion Control Measures: PetroShare will maintain a Stormwater Management Plan with site specific measures for erosion control. PetroShare will make thorough inspections, in accordance with the requirements set forth by CDPHE Water Quality Division (WQD). The inspection schedule is as follows:

- While site and road is under construction, an inspection is required at least every 14 calendar days;
- Post storm event inspections must be conducted within 24 hours after the end of any precipitation or snowmelt event that causes surface erosion.

Inspection records will be kept on file for a minimum of five (5) years from expiration or inactivation of permit coverage.

Traffic Control: PetroShare will construct all leasehold roads to accommodate local emergency vehicle access requirements and will be maintained in a reasonable condition. The location in concurrence with the surface owner and developer was chosen to minimize surface disturbance by using the shortest possible path to the wellsite. PetroShare intends to utilize onsite water and pipelines which will reduce traffic.

General Housekeeping

Guy Line Anchors: All guy line anchors left buried for future use will be identified by a marker of bright color not less than four feet in height and not greater than one foot further of the guy line anchor.

Removal of Surface Trash: PetroShare agrees that all trash, refuse pipe, equipment, liquids, chemicals or other materials that are not necessary for the continued operations of the wells will be removed and disposed of no later than 30 days after completion. No such items will be burned or buried on location.

Material Handling and Spill Prevention

Leak Detection Plan: To ensure protection for the surface during fracturing treatment, the location will be specifically constructed to contain any releases or spills. All containment will be constructed of steel with impermeable barriers installed inside and along the internal sidewalks of the containment. Volume capacity will be 110% or greater of the largest tank plus largest annual rainfall.

Leak detection will be monitored by daily operator inspections and remote hi/lo pressure monitoring with electronic shut down functionality. Secondary containment will surround any trucks that carry, mix, or add chemicals to the flow stream as well as connections that could possibly leak fluid. Should any spill or release occur, every reasonable step will be taken to quickly remediate the area disturbed. One (1) to seven (7) inspections per week will be recorded and kept in the district office and available to regulatory agencies. Records will be kept electronically indefinitely. All tanks will have hi level shut down for all producing wells on the pad.

Both gas and oil will be sold via pipeline and consequently will have remote Emergency Shut-Down (ESD) system functionality and independently tied to the operational status of the purchasing line(s) as well as high pressure ESD for all lines and vessels.

Any spills/release reportable to COGCC, will also be reported to Adams County verbally or in writing to the County's Local Government Designee (LGD), Local Planning and Development Department, Sheriff's Office, and the local fire district as soon as possible, but no more than 24 hours after discovery of the spill or release by PetroShare. This includes spills/releases: 1) of any size that impacts or threatens to impacts any waters of the state, a residence or occupied structure, livestock, or public byway; 2) in which one (1) or more barrels of Exploration and Production Waste or produced fluid is spilled or released outside of berms or other secondary containment; and 3) of five (5) or more barrels regardless of whether the spill/release is completely contained within berms or other secondary containment. In addition, PetroShare will notify the surface owner or the surface owner's tenant of spills/releases in compliance with COGCC rules.

Control of Fire Hazards: PetroShare and its contractor's will employ best management practices during the drilling and production of its wells and facilities. They will comply with appropriate COGCC and Adams County rules concerning fire and safety. PetroShare will ensure that any flammable material will remain no less than 25 feet from the wellhead(s), tank(s) and separator(s).

Berm Construction: A steel containment berm or structure will be erected around the oil and water storage tanks. The steel berm will be inspected at least every 14 calendar days while the site is under construction and within 24 hours of a precipitation event. During the production phase one (1) to seven (7) inspections per week will be recorded and kept in the district office and available to regulatory agencies. Records will be kept electronically indefinitely.

Tank specifications: Tanks shall be constructed and maintained in accordance with the National Fire Protection Association Code 30 (2008 version). All tanks will be visually inspected once a day. Recorded inspections will be conducted once a month pursuant to 40 CFR §112.

Material Safety Data Sheets (MSDS) for materials and chemicals used will be kept onsite and updated/modified for each phase of operations. They will be made available to any emergency responders as needed.

Construction

Fencing: PetroShare will comply with COGCC rule 604.c.(2)M regarding fencing requirements. Well sites within designated setback locations will be adequately fenced to restrict access by unauthorized persons. If fencing is to be installed a permit will be obtained prior to the construction of the fence. Access for Emergency Responders will be detailed in the Emergency Response plan.

Drilling/Completion Operations

Closed Loop System: A Closed Loop System will be used for drilling and fluid management. An open reserve pit will not be used. Water based cuttings generated and will be assessed for land farming applications. Any cuttings other than water based will be hauled to an approved waste disposal site.

Green Completions: Emission Control Systems. Test separators and associated flow lines and sand traps shall be installed on-site to accommodate green completion techniques pursuant to COGCC Rules.

Air Emissions: Air emission sources shall comply with provisions of the state air quality control program and the rules and regulation promulgated by the State Air Quality Control. PetroShare will employ control measures and operating procedures as are necessary to minimize fugitive particulate emissions into the atmosphere.

Wildlife and Wildlife Habitat: The proposed oil and gas wells are not within a sensitive wildlife habitat. PetroShare will not cause significant degradation of wildlife.

BOPE for well servicing operations: Adequate blowout prevention equipment will be used on any servicing operations associated with this well. Backup staving valves shall be required on well servicing operations during reverse circulation. Valves will be pressure tested before each well servicing operation using both low-pressure and high-pressure fluid.

Water Sampling: PetroShare will adhere to COGCC Rule 318.A. PetroShare will utilize COGCC's criteria and protocol for analysis and submission to the COGCC data system. If there are no available water sources within a ½ mile radius of the proposed oil and gas facility, PetroShare will test the nearest downgradient water source within a one (1) mile radius prior to construction.

Interim Restoration (Production): Rehabilitation of unneeded, previously disturbed areas will consist of back sloping, and contouring all cut/fill slopes. These areas will be reseeded. The portions of the cleared well site not needed for operational and safety purposes will be recontoured to the original contour if feasible, or if not feasible, to an interim contour that blends with the surrounding topography as much as possible. Sufficient level area will remain for setup of a workover rig and to park equipment. In some cases, rig anchors may need to be pulled and reset after recontouring to allow for maximum interim reclamation.

Final Reclamation

Well site cleared. Within 90 days subsequent to the time of plugging and abandonment of the entire site, superfluous debris and equipment shall be removed from the site.

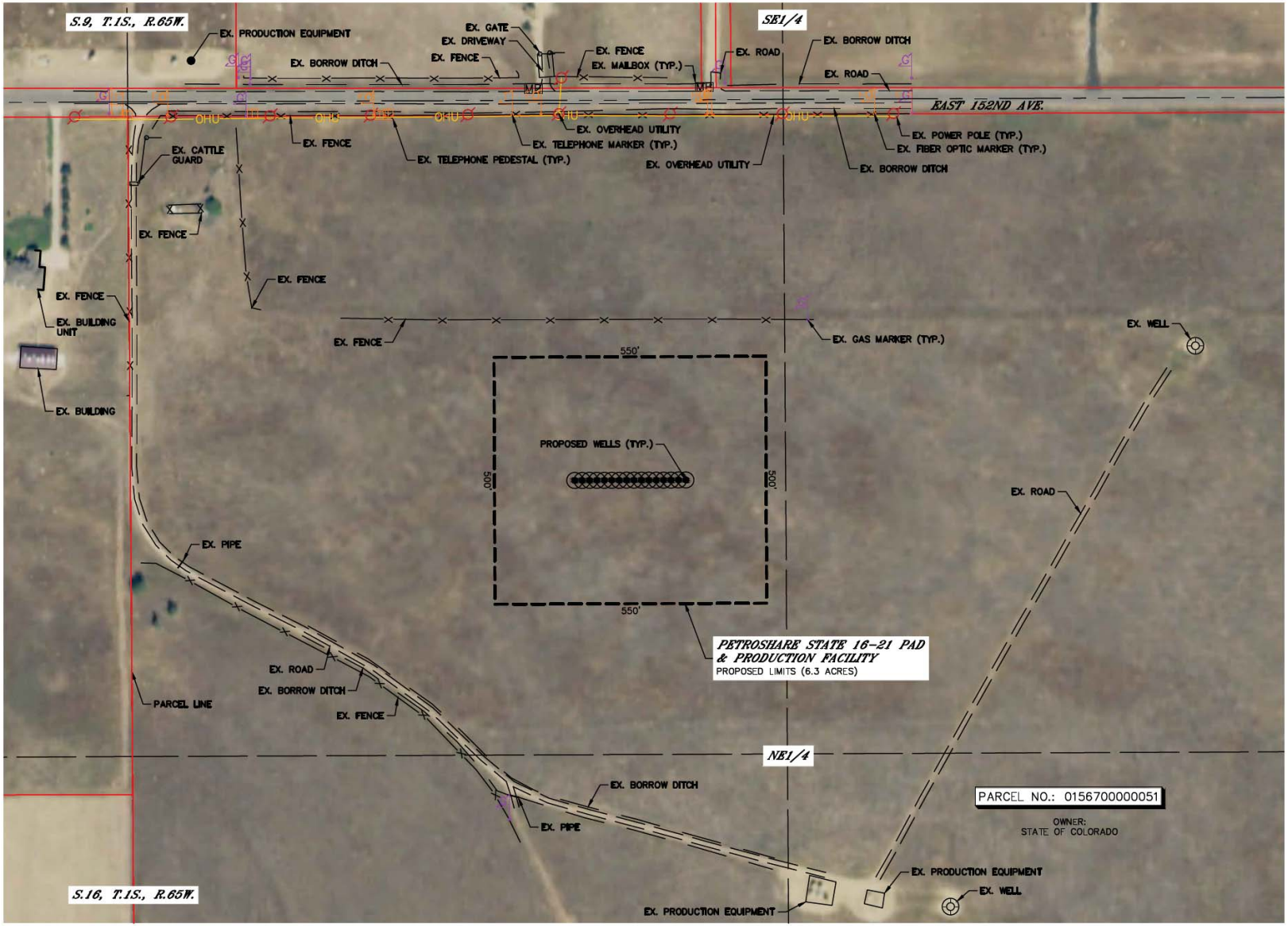
EXHIBIT 2.2
APPLICANT SITE PLAN

Lat40°, Inc. 6250 W. 10th Street, Unit 2, Greeley, CO 970-515-5294

SITE PLAN

PETROSHARE STATE 16-21 PAD

SECTION: 16
TOWNSHIP: 1S
RANGE: 65W
6TH. P.M.
ADAMS COUNTY, CO



0 200
1"=200'

DATE: 2/6/2018
PROJECT#: 2017101

EXHIBIT 2.3
Ambient Sound Study

May 24, 2018

Meghan Grimes
Petroshare Corporation
7200 S. Alton Way
Centennial CO 80112

Attention: Meghan Grimes

Subject: State 16-21 Pad Site Ambient Sound Level Survey & Model – Brighton, CO

Dear Ms. Grimes,

The following Ambient Sound Level Survey and Noise Impact Model was developed for your future State 16-21 pad site located in Brighton, Colorado. The noise levels produced by the drilling and fracturing operations at the site could possibly exceed the noise standards set forth by the *Colorado Oil & Gas Conservation Commission, AESTHETIC AND NOISE CONTROL REGULATIONS* section of the ordinance. The following report documents the ambient sound levels, identifies the noise sources for drilling / fracturing operations and includes noise mitigation models for both scenarios.

Site Location and Conditions

The State 16-21 pad site is located off East 152nd Ave approximately 1.5 miles west of Hayesmount Road The nearest occupied structure is a single-family residential property and is located approximately 974 feet north of the well head. Open pastures surround the location and residential properties are located around of the pad site. The topography of the location is predominantly flat in all directions surrounding the location. Lease road entrance and well head coordinates are below.

Well Head Coordinates
39°58'13.79"N
104°39'54.26"W

Weather Conditions

The average temperature was between 45ºF - 77ºF throughout the entire duration of the survey with an with 0.35” of precipitation due to thunderstorms recorded during the survey.

(Continued on Next Page)

Sound Level Survey Instrumentation

A Brűel and Kjær 2250 Type 1 Hand-held Analyzer sound level meter was programmed, field calibrated, and deployed south of the pad site near the residential properties. The meter was programmed to measure the A-weighted (dBA) C-Weighted (dBC) and the frequency noise levels. The metering system was installed on a t-post approximately 4 feet above ground level in a locked weatherproof enclosure for security purposes. Figure 1 displays the future drill site and the ambient noise measurement location.

C.O.G.C.- AESTHETIC AND NOISE CONTROL REGULATIONS

a. The goal of this rule is to identify noise sources related to oil and gas operations that impact surrounding landowners and to implement cost-effective and technically feasible mitigation measures to bring oil and gas facilities into compliance with the allowable noise levels identified in subsection c. Operators should be aware that noise control is most effectively addressed at the siting and design phase, especially with respect to centralized compression and other downstream "gas facilities" (see definition in the 100 Series of these rules).

b. Oil and gas operations at any well site, production facility, or gas facility shall comply with the following maximum permissible noise levels.

ZONE	7:00 am to next 7:00 pm	7:00 pm to next 7:00 am
Residential/Agricultural/Rural	55 db(A)	50 db(A)
Commercial	60 db(A)	55 db(A)
Light industrial	70 db(A)	65 db(A)
Industrial	80 db(A)	75 db(A)

The type of land use of the surrounding area shall be determined by the Director in consultation with the Local Governmental Designee taking into consideration any applicable zoning or other local land use designation. In the hours between 7:00 a.m. and the next 7:00 the noise levels permitted above may be increased ten (10) dB(A) for a period not to exceed fifteen (15) minutes in any one (1) hour period. The allowable noise level for periodic, impulsive or shrill noises is reduced by five (5) dB(A) from the levels shown.

Ambient Sound Level Survey

A 72-hour pre-drilling ambient noise survey was taken at the State 16-21 pad site from Sunday, May 13, to Tuesday, December 15, 2018, to measure and document the pre-drilling ambient sound levels at the site. Noise sources observed by the technician during the ambient noise survey include insects, birds, and other wildlife as well as nearby road traffic to the south.

(Continued on Next Page)

Ambient Measurement Results

The ambient sound level data collected at the site is attached in both a graphed and tabular form, along with the established 72-hour ambient sound levels. The measured 3-day average sound level was 54.8 dBA and 64.8 dBC.

Summary of Findings

We can expect the following LAeq averages to be produced by the unmitigated operational equipment during specific operations when measured at the nearby residence as shown in figure 6&8.

Operations Type	Expected Sound Levels
Drilling	50-62 dBA
Fracturing	54-65 dBA

If at any time during the operations, the noise levels remain above the maximum permissible noise levels, mitigation techniques defined in this plan may be utilized.

Noise Impact Model Results

The *unmitigated noise impact models* for drilling and fracing are included as Attachments 6 & 8. It displays an estimated sound level of 50-62 dBA for drilling and 54-65 dBA for fracing operations when measured at the property line. The *mitigated noise impact models* are included as Attachments 7 & 9. It displays the estimated sound levels to be between 40-52 dBA for drilling and 44-54 dBA for fracing operations with the installation of a noise barrier. The noise barrier would decrease the overall noise level of the drilling operations by 10-12 dBA and 8-10 dBA for fracing operations at the receiver. To properly adhere to the C.O.G.C. and to mitigate the noise at the receiver, we recommend constructing a 32' tall temporary sound wall to be installed on the perimeter of the pad site. The sound wall should be constructed as close to the equipment in question to effectively mitigate the sound levels. The sound wall should be a minimum of a STC-27 rating.

(Continued on Next Page)

Noise Impact Potential

The typical primary noise sources generated by gas well drilling operations include the drilling rig engines, compressors, generators, mud pumps, shakers, and ancillary support equipment. Drilling sound levels vary from drill site to drill site depending on the type of drilling rig (top drive, rotary table, etc.) and depending on the drilling rig orientation at the site. The highest drilling related noise levels are typically measured on the generator side of the rig.

The maximum noise levels generated during gas well fracturing operations are produced from the truck mounted engines which drive the high pressure pumps. Support equipment such as sand trucks, water pumps and generators have a small contribution to the over-all noise levels of the operations. Off-site fracturing noise levels typically do not vary greatly from operator to operator, but the off-site transmission of the noise can be affected by the surrounding topography of the fracing site.

Noise impact models were created to evaluate and predict the noise impact potential of typical drilling and fracturing operations on the site's adjacent surroundings. Noise mitigation measures were included in the models to ensure compliance with the allowable drilling noise levels established above.

The results of the noise impact models are included in Figures 6-9 to this report. Figures 6 and 8 display the *unmitigated sound levels* for drilling and fracturing operations. Figures 7 and 9 display the *mitigated sound levels* for drilling and fracturing operations.

Noise Mitigation Recommendations	Activity
Install a 32ft. tall temporary acoustical sound wall on the pads perimeter, with an STC-27 rating or higher	drilling, fracturing
Orient the drilling rig such that the generators are on the north side of the wellhead to maximize the distance between the generators and the regulated receivers	drilling
Orient and position fracturing trucks to minimize the distance between the pump trucks and the acoustical walls	fracturing

Additional Noise Mitigation Measures (if necessary)	Activity
Install 16ft. high, 3-sided generator enclosure	drilling
Install rig floor acoustical blankets on east, south & west sides to block the line-of- sight noise transmission to the regulated receivers	drilling

(Continued on Next Page)

Although elevated low frequency noise levels are not anticipated at this site, if compliance measurements reveal a low frequency noise issue, install acoustical barriers specifically designed for blocking low frequency noise transmission from shaker table, mud pumps, and/or fracturing pump trucks.

drilling, fracturing

Please contact us if you have any questions or comments.

Sincerely,

Bradley Webb
V.P. of Operations
Absolute Noise Control
(817) 565-8464

ABSOLUTE NOISE CONTROL
Noise Mitigation & Consulting

Attachments

Figure 1.
State 16-21 Pad Site & Noise Measurement Location

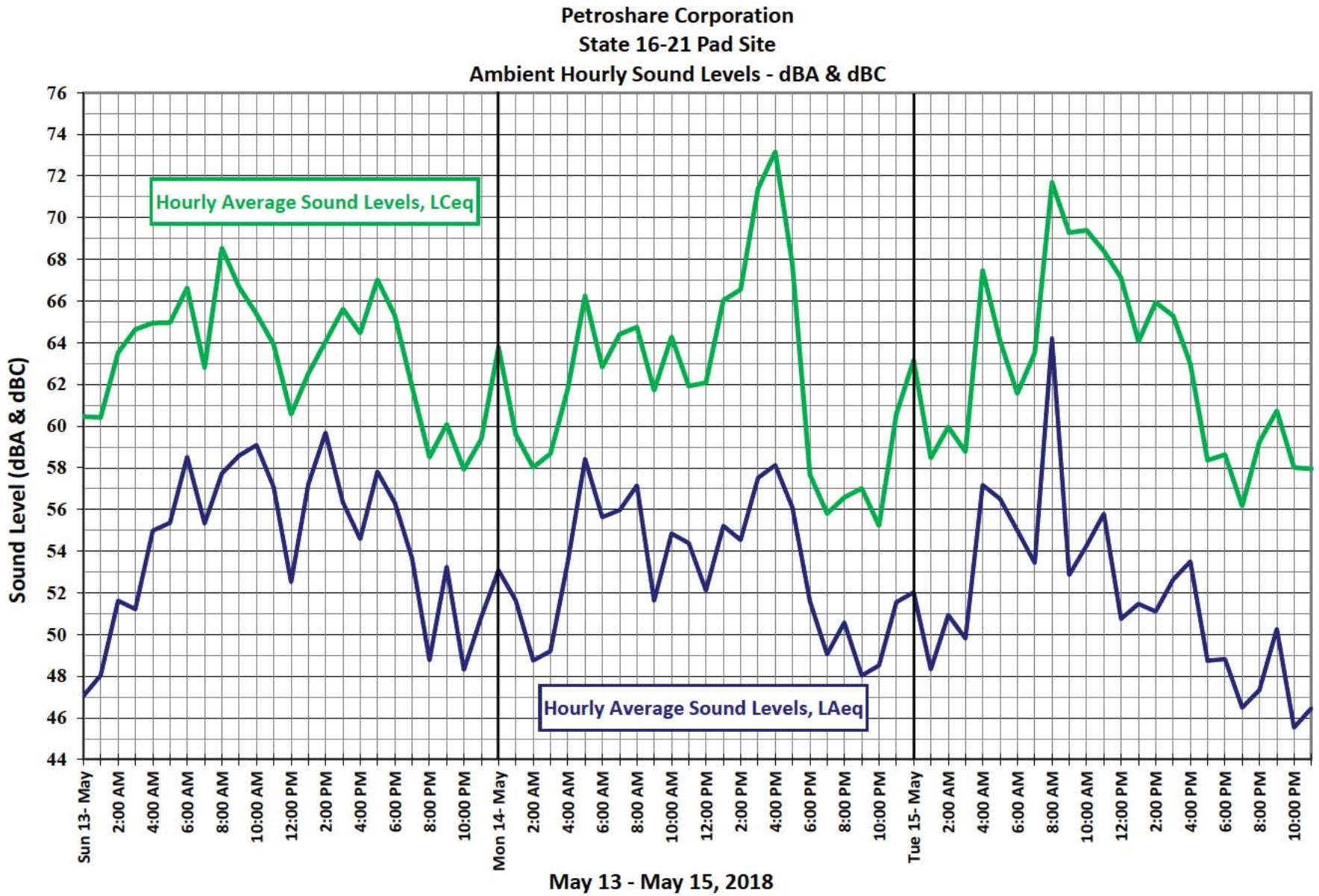


Figure 2.
State 16-21 Pad Site – Hourly Average dBA & dBC

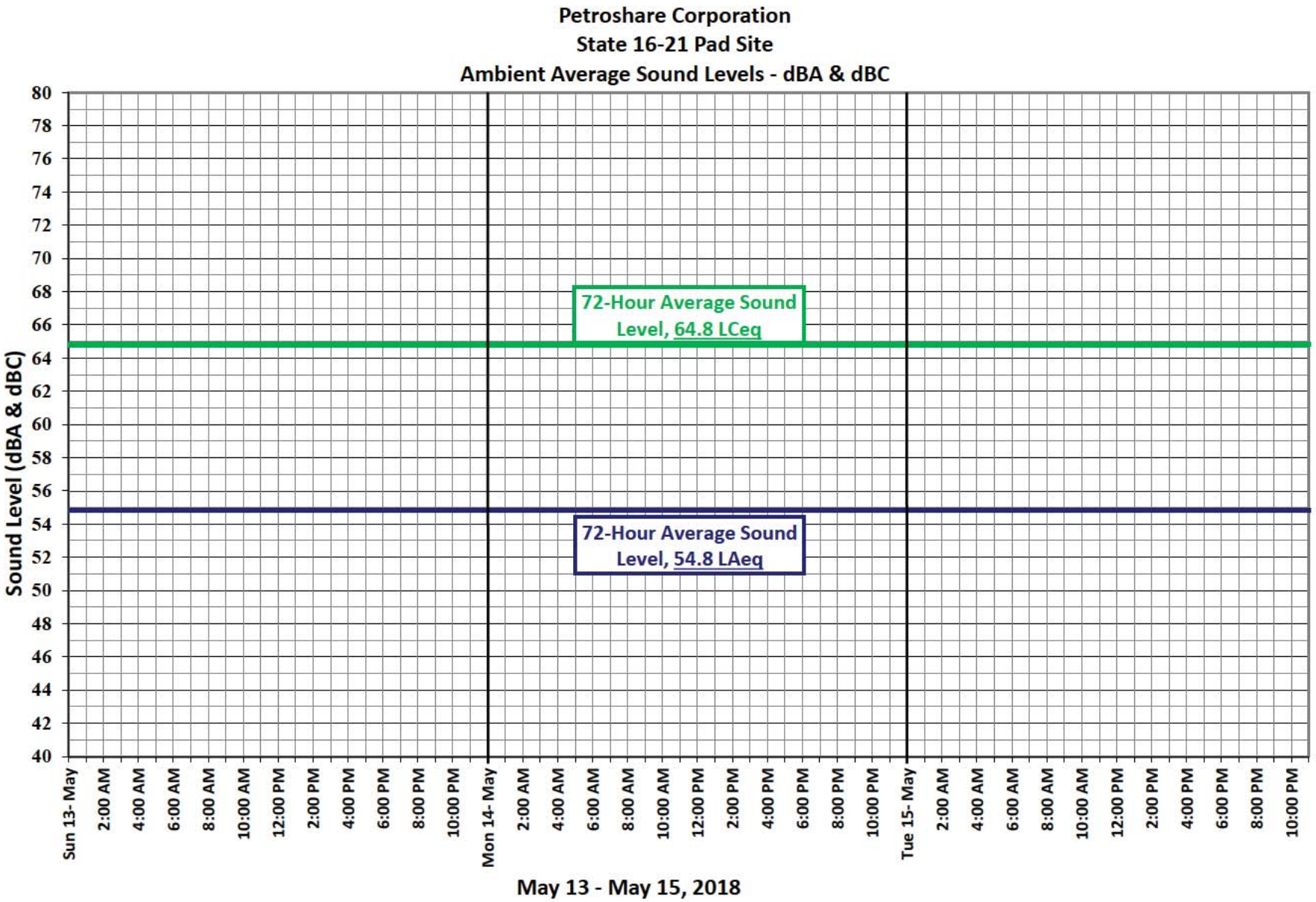


Figure 3.
State 16-21 Pad Site – 72 Hour Average dBA & dBC

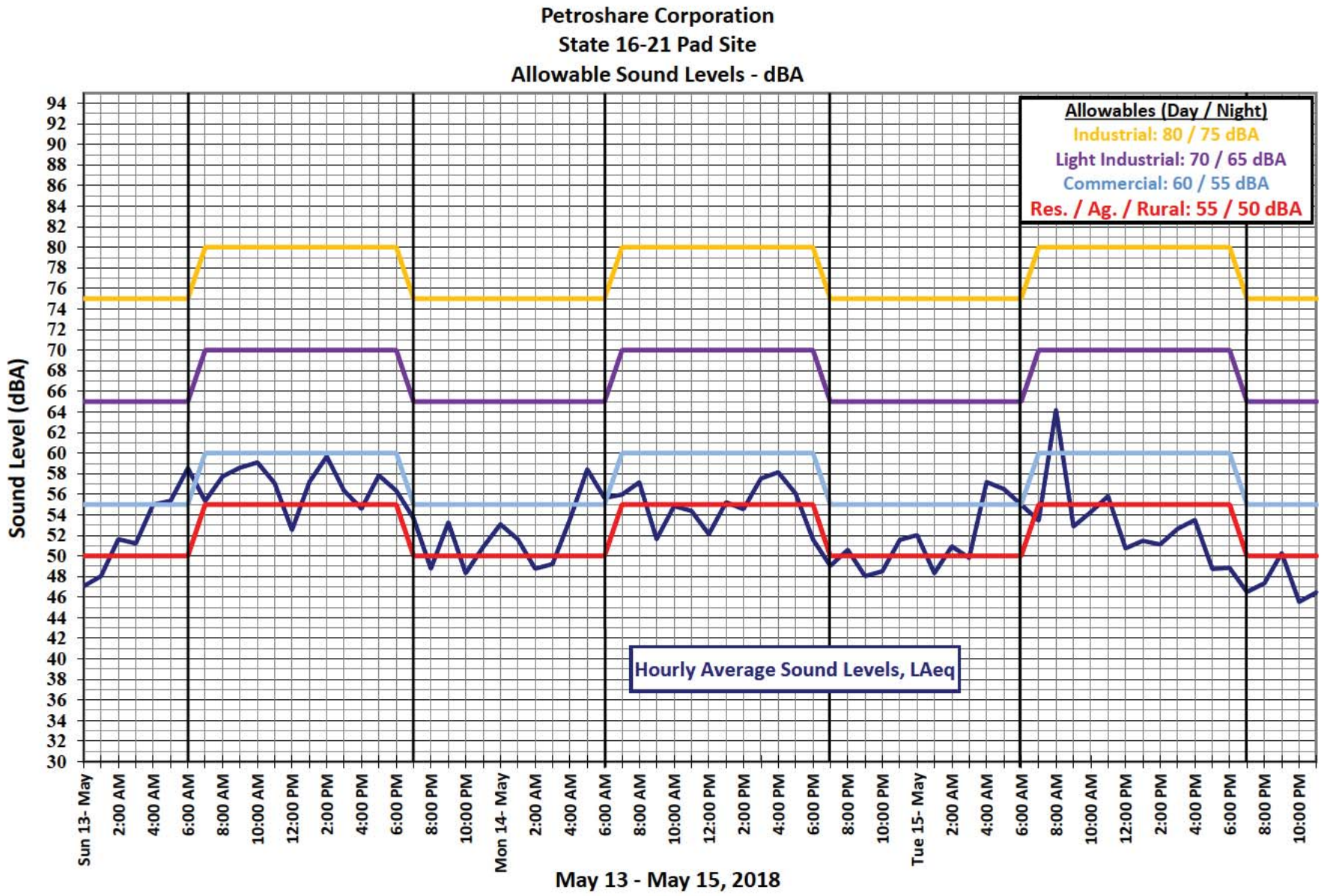


Figure 4.
State 16-21 Pad Site – Allowable Sound Levels

State 16-21 Pad Site					
Time	LAeq	LCeq	Time	LAeq	LCeq
Sun 13- May	47.1	60.5	1:00 PM	55.2	66.0
1:00 AM	48.0	60.4	2:00 PM	54.5	66.6
2:00 AM	51.6	63.5	3:00 PM	57.5	71.4
3:00 AM	51.2	64.6	4:00 PM	58.1	73.2
4:00 AM	55.0	65.0	5:00 PM	56.1	67.7
5:00 AM	55.4	65.0	6:00 PM	51.6	57.7
6:00 AM	58.5	66.6	7:00 PM	49.1	55.8
7:00 AM	55.3	62.8	8:00 PM	50.6	56.6
8:00 AM	57.7	68.6	9:00 PM	48.0	57.0
9:00 AM	58.6	66.7	10:00 PM	48.5	55.2
10:00 AM	59.1	65.4	11:00 PM	51.6	60.6
11:00 AM	57.1	63.9	Tue 15- May	52.0	63.2
12:00 PM	52.5	60.6	1:00 AM	48.3	58.5
1:00 PM	57.2	62.5	2:00 AM	50.9	60.0
2:00 PM	59.7	64.1	3:00 AM	49.8	58.8
3:00 PM	56.3	65.6	4:00 AM	57.2	67.5
4:00 PM	54.6	64.5	5:00 AM	56.5	64.1
5:00 PM	57.8	67.0	6:00 AM	55.0	61.6
6:00 PM	56.3	65.3	7:00 AM	53.4	63.5
7:00 PM	53.7	61.9	8:00 AM	64.2	71.7
8:00 PM	48.8	58.5	9:00 AM	52.9	69.3
9:00 PM	53.3	60.1	10:00 AM	54.3	69.4
10:00 PM	48.3	57.9	11:00 AM	55.8	68.4
11:00 PM	50.9	59.4	12:00 PM	50.8	67.1
Mon 14- May	53.1	63.8	1:00 PM	51.5	64.1
1:00 AM	51.6	59.6	2:00 PM	51.1	65.9
2:00 AM	48.8	58.0	3:00 PM	52.6	65.3
3:00 AM	49.2	58.7	4:00 PM	53.5	63.0
4:00 AM	53.5	61.8	5:00 PM	48.7	58.4
5:00 AM	58.4	66.2	6:00 PM	48.8	58.6
6:00 AM	55.6	62.8	7:00 PM	46.5	56.2
7:00 AM	56.0	64.4	8:00 PM	47.3	59.2
8:00 AM	57.2	64.8	9:00 PM	50.3	60.7
9:00 AM	51.6	61.7	10:00 PM	45.5	58.0
10:00 AM	54.9	64.3	11:00 PM	46.5	58.0
11:00 AM	54.4	61.9			
12:00 PM	52.1	62.1			

	LAeq	LCeq
72-Hour (3-day) Average:	54.8	64.8

Figure 5.
State 16-21 Pad Site – Ambient Sound Level Data

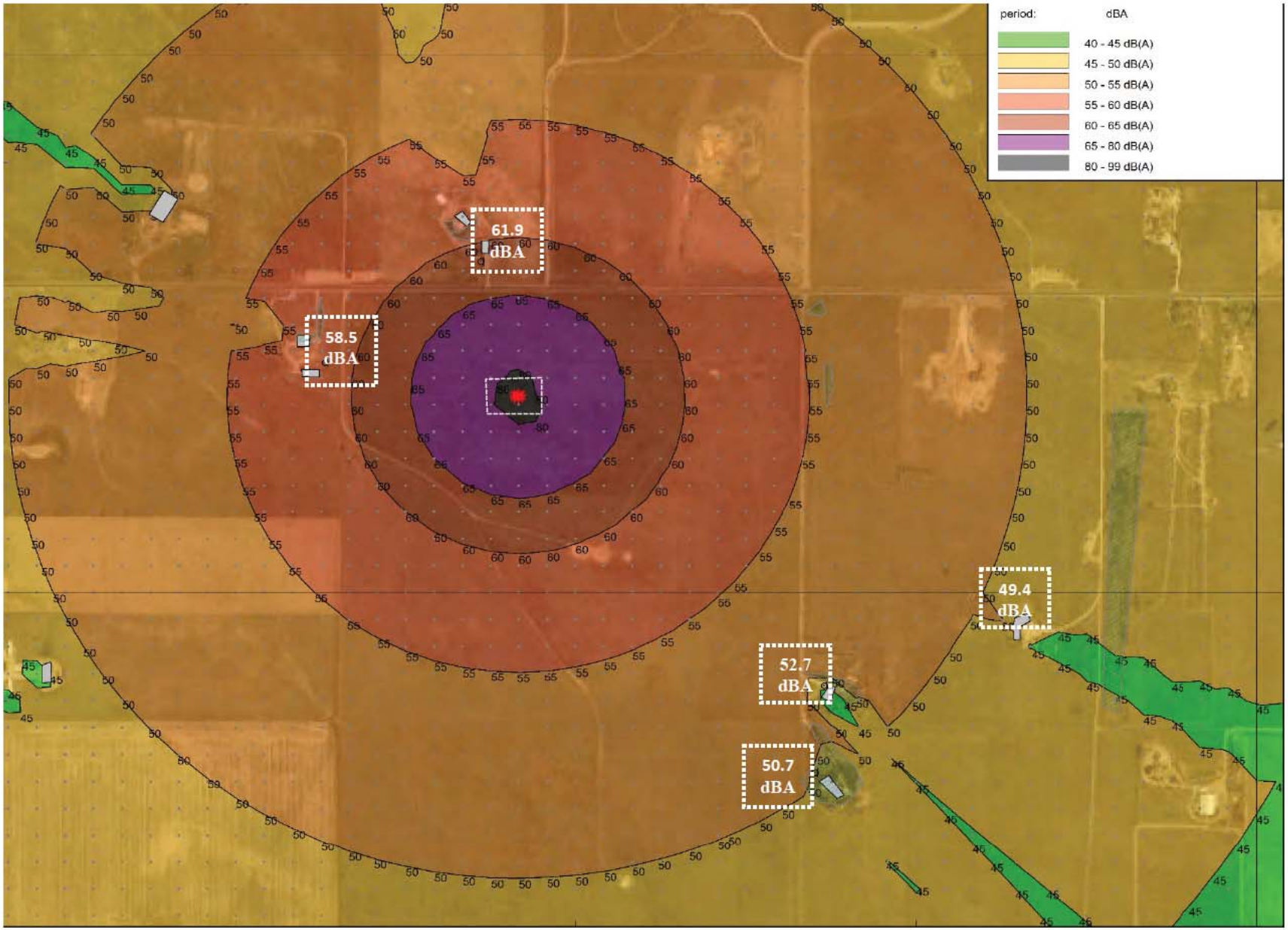


Figure 6.
State 16-21 Pad Site – Unmitigated Drilling Operations

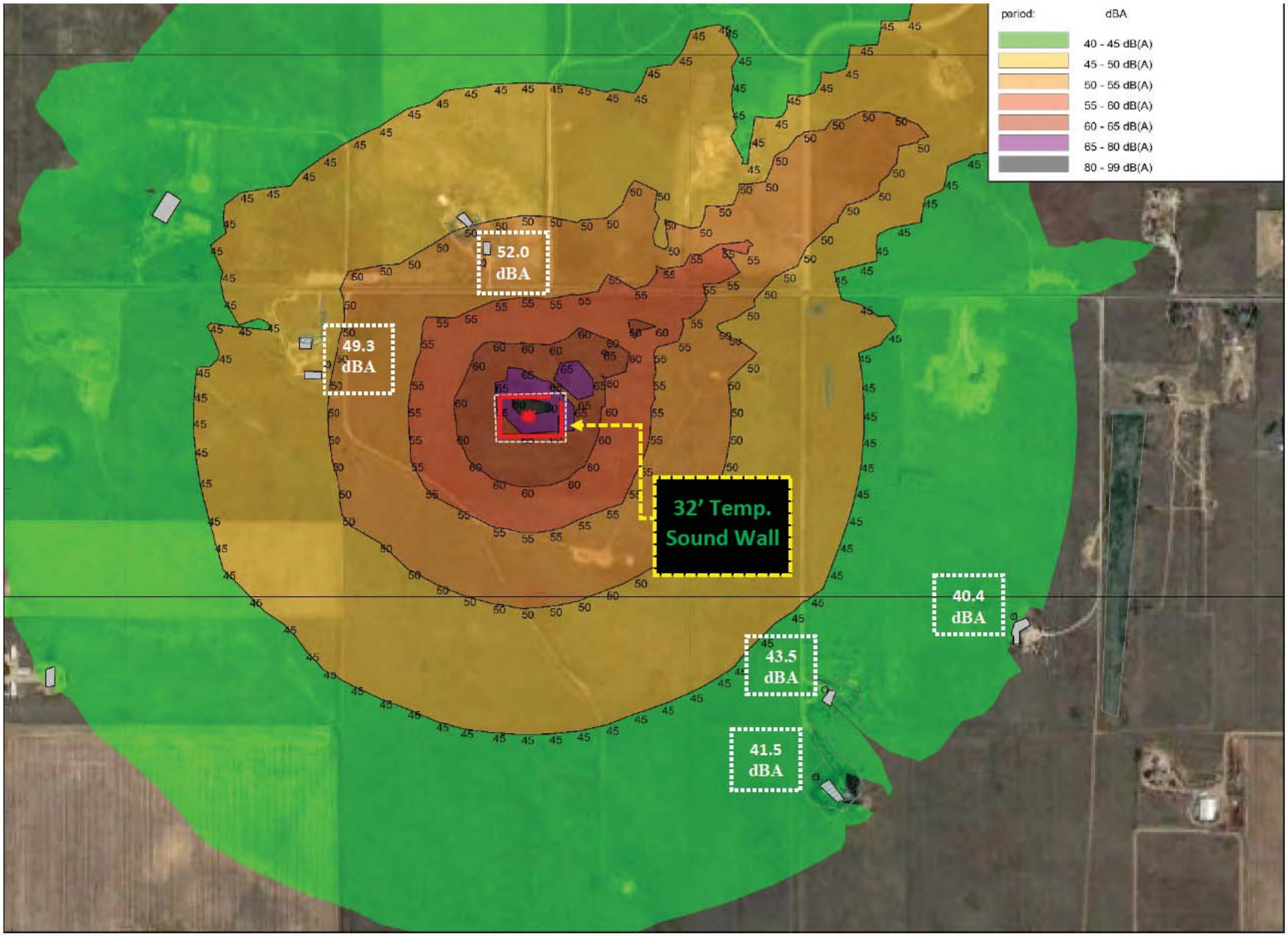


Figure 7.
State 16-21 Pad Site – Mitigated Drilling Operations

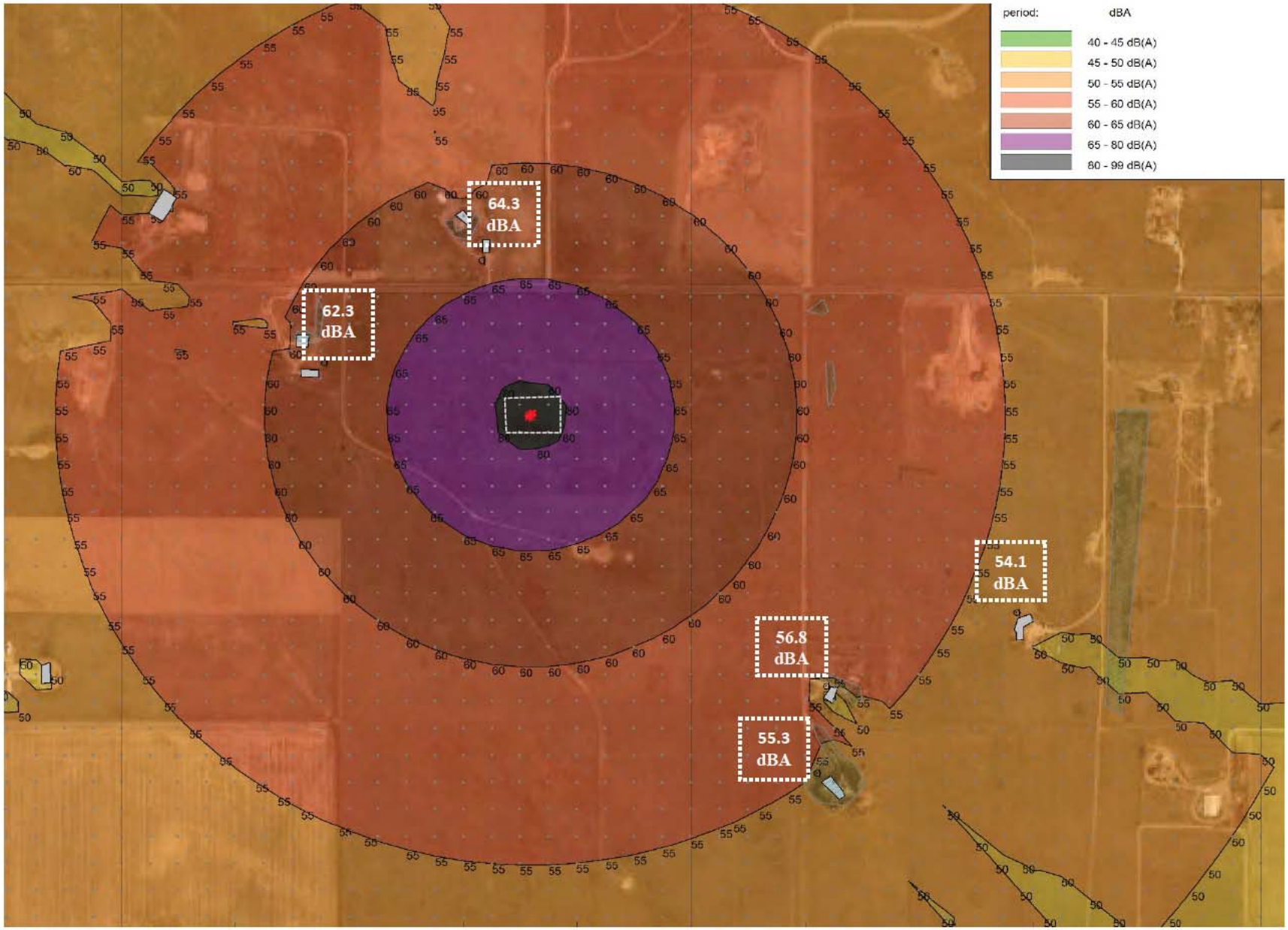


Figure 8.
State 16-21 Pad Site – Unmitigated Fracing Operations

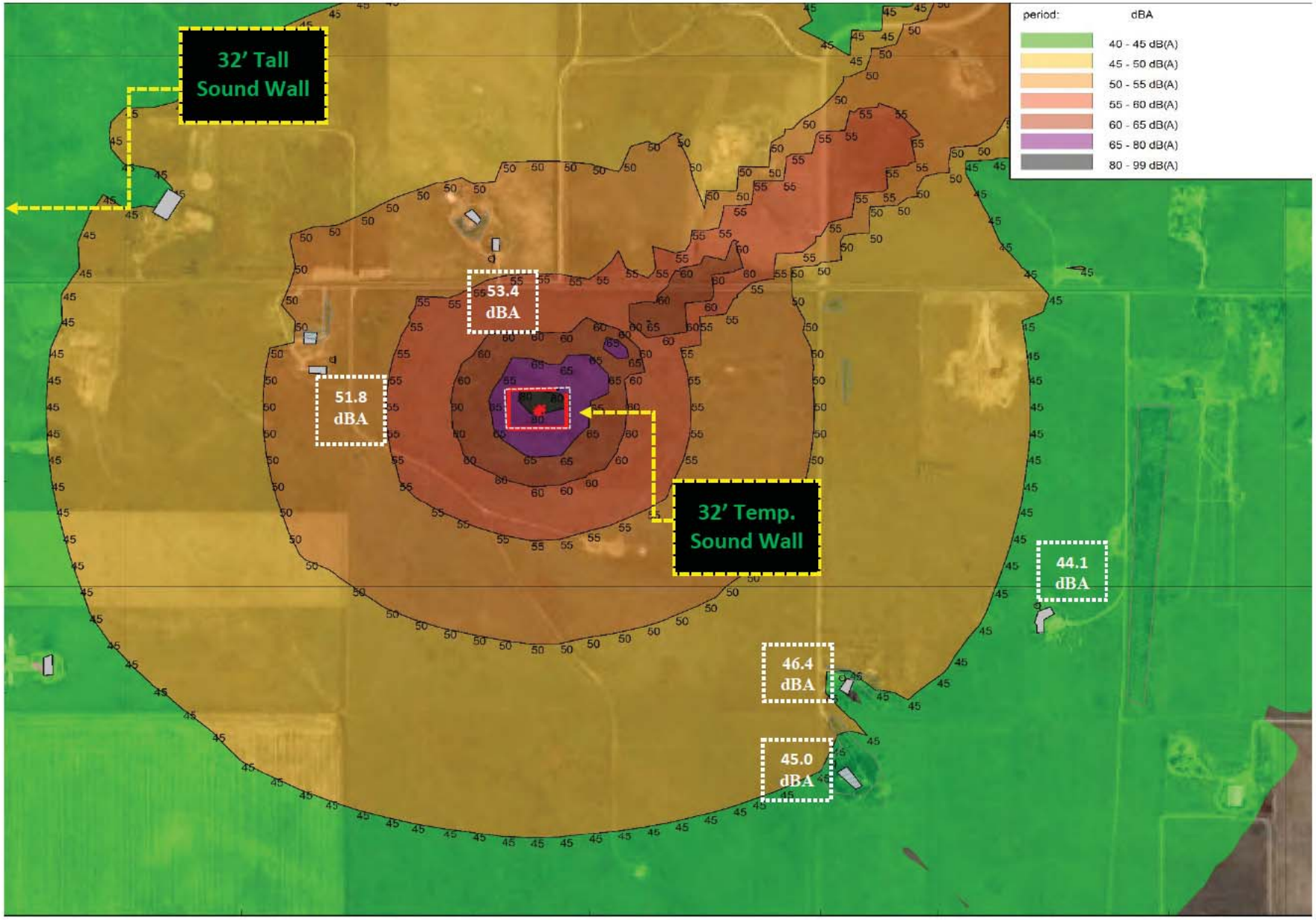


Figure 9.
State 16-21 Pad Site – Mitigated Fracing Operations

EXHIBIT 2.4
Traffic Impact Fee Schedule

Community & Economic
Development Department
www.adcogov.org

ADAMS COUNTY
COLORADO

4430 South Adams County Parkway
1st Floor, Suite W2000B
Brighton, CO 80601-8218
PHONE 720.523.6800
FAX 720.523.6967

Applicant:	PetroShare
Project Name:	PetroShare State well pad
Project Number:	USR2018-00008

West of Shumaker Road Fee Schedule Pipeline Scenerio					Enter the number of wells being permitted		
Fresh Water Pipeline	Produced Water Pipeline	Product Pipeline (petroleum)					
Per Pad Fee							
N/A	N/A	N/A	$	753	-		
Per Well Fee							
-	-	-	$	36,523		$	-
X	-	-	$	35,034		$	-
-	-	X	$	21,112		$	-
-	X	-	$	20,227		$	-
X	-	X	$	19,623	16	$	313,968
X	X	-	$	18,738		$	-
-	X	X	$	4,816		$	-
X	X	X	$	3,327		$	-
					Traffic Impact Fee	$	314,721

EXHIBIT 3.1
Request for Comments

Community & Economic
Development Department
www.adcogov.org

ADAMS COUNTY
COLORADO

4430 South Adams County Parkway
1st Floor, Suite W2000
Brighton, CO 80601-8204
PHONE 720.523.6800
FAX 720.523.6998

Request for Comments

Case Name: PetroShare - State Well Pad

Project Number: USR2018-00008

October 31, 2018

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

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

This request is located at approximately southeast of Powhaton Road and 152nd Avenue.

The Assessor's Parcel Number is 0156700000051.

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 November 21, 2018 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 cdougherty@adcogov.org.

The complete Use by Special Review Permit application can be found at www.adcogov.org/planning/currentcases.

Additional Oil and Gas information can be found at www.adcogov.org/oil-and-gas-information.

Thank you for your review of this case.

Christine Dougherty

Christine Dougherty
Case Manager

BOARD OF COUNTY COMMISSIONERS

Eva J. Henry — DISTRICT 1
Charles "Chaz" Tedesco — DISTRICT 2
Erik Hansen — DISTRICT 3
Steve O'Dorisio — DISTRICT 4
Mary Hodge — DISTRICT 5

EXHIBIT 3.2
Comments Received

Adams County
Community and Economic Development Department
Development Review Comments

	Case Number: USR2018-00008			**Case Name: State**
	Applicant: PetroShare			**Date Initiated: 11/28/2018**
Referral Comment No.	**Mapped?**	**Reviewer Initials**	**County Comment**	**Applicant Response** (date)
1		CD	No Comment	

Referral Agency Comments:

Brighton Fire Rescue:

- ERP pg. 4 – The gps coordinates do not appear to be for the site access. Please provide the correct coordinates for the access off of East 152nd Avenue in addition to the site coordinates.
- ERP pg. 4 - The emergency number for us should be 911. Having the non-emergency line in this section may be confusing.
- ERP pg. 5 – The non-emergency number for us should be 3032881535.
- The ERP submitted is a helpful resource for your employees and responder, however in order to better aid our responders we are requesting an overview document or summary card that contains the information that may be referenced quickly by our personnel. This document should be site specific and a copy should be provided to us to be kept in the responding fire apparatus. The summary card should include the following at a minimum:
    1. The facility name, address, and gps coordinates of the site access
    2. Site map showing pertinent information such as:
        i. Access roads
        ii. Site layout
        iii. Nearby residences (within 3,000 feet)
        iv. Nearby businesses (within 3,000 feet)
    3. Response resource contact info
        i. PetroShare
        ii. State, federal, and municipal responders
        iii. Response contractors
    4. Critical receptors in the area listed and shown on site map
    5. Well pad liquid storage statistics (oil and water)

Colorado Parks and Wildlife: CPW has identified the site as a potential habitat for a variety of different mammals and bird species, and has provided recommendations accordingly.

1. If a raptor or other migratory bird nest is identified and active then it is recommended that, a buffer is implemented to prevent intentional or unintentional destruction of the nest.
2. If a prairie dog colony is discovered within the project area, the potential for burrowing owls also exist, and CPW has provided guidelines for performing surveys, best times for earth –moving activities, and general guidance if the colony is still active.
3. Recommend all site lights be motion –activated and downward directed.
4. Fence guidelines are provided, but they will need to be reviewed by staff prior to implementing the recommendations.
5. CPW recommends a weed management plan to prevent the spread of noxious weeds.
6. A complete copy of the comments is attached for your review.

Tri-County Health:

1. If an On-site Wastewater Treatment System is used then a permit will be required from Tri-County Health.
2. 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.

a. That the County or applicant notify owners of the wells or groundwater rights owners of the proposed application;
b. 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
c. That the County refers well owners desiring guidance for wellhead protection to TCHD.

3. Tri-County is requesting to review information regarding the source of water for workers as well as any proposed potable water systems used by workers.
4. Non-potable water stored on site should be marked accordingly.
5. Secondary containment must be provided for all on site fuel storage.

CDPHE:

1) Recommend the utilization of electrical equipment and devices to the extent practical in order to reduce emissions.
2) CDPHE recommends the use of chiller and chemicals to mask or neutralize hydrocarbon odors emulating from drilling mud; using a squeegee to remove drilling fluids from drilling pipe, and covered containers to store drilling mud on site, an d minimize the use of diesel fuels as additives in drilling mud.
3) Test for and properly dispose of TENORM
4) Recommend the use of pipelines to support green completions and reduce the possibility of flaring.
5) The facility is located in DMNFR non-attainment area and recommends limited use of flares.
6) Implement measures to control unnecessary and excessive venting during plugging and abandonment operations.

County Staff:

1) Landscape review:
    a. PLN1. The proposed landscape plan does not conform to the requirements of Section 4-16 of the Adams County Development Standards and Regulations. **A re-submittal is required.**
    b. PLN2. A minimum of 10% lot landscape is required. In addition, buffer areas with trees and shrubs are required for lesser intensity uses (residential) and along right-of-way (E. 152nd Ave). A minimum of 75% living plant material is required with a maximum of 25% non-living landscape.
    c. PLN3. Please include the setbacks of the well locations from all property lines and the nearest right-of-way, residential structures, etc.
    d. PLN4. Screen fencing is required. Please include proposed fence details (height, location, material).
    e. PLN5. The irrigation method is required on the landscape plan (i.e. drip system, water truck, etc).

2) Case Manager:
    a. Applicant is required to provide baseline well water testing of any registered residential water wells within ½ mile of the proposed oil and gas wells or production facility upon request of the owner. Has the applicant received any request for baseline testing? If no residential wells will be tested due to request by the owner, what wells has the applicant identified to test to be compliant with COGCC regulations?
    b. Where are the minerals that are being developed located ? Section, Township and Range is adequate.
    c. Where is the required water being sourced? Will the water be trucked in, piped in, or sourced on site?
    d. Where is produce water being disposed?
    e. Will produced water be trucked off site or piped off site?
    f. Will any existing oil and gas wells located within the defined drilling unit be plugged and abandoned because of this new facility?
    g. The written summary states that pipelines will terminate at the sales point meter(s), who will be responsible for bringing pipe to the facility? Will that section of the pipe be permitted and constructed under this AUSR application? If yes, please provide information

about route selection and provide signed agreement or owner authorization (affidavit) from the property owners who’s property the pipe will be crossing.

From:	Drew Chitiea
To:	Christine Dougherty
Subject:	Comments
Date:	Thursday, November 08, 2018 4:40:33 PM

Re: Petroshare - State Well Pad
Project # USR2018-00008

As a property/leasehold holder on Front Range Airport, I have no objections to this project.

Regards,

Andrew D Chitiea
37700 Cessna Way #1 West
Watkins, CO 80137
303-638-7181

Comment 1

From:	Even, Whitney
To:	Christine Dougherty
Cc:	Mike Schuppe
Subject:	FW: Adams County CED Request for Comments - USR2018-00008
Date:	Wednesday, November 21, 2018 10:28:18 AM
Attachments:	image003.png PetroShare_State_AUSR_Written_Summary.pdf PetroShare_State_AUSR_Emergency_Response_Plan.pdf PetroShare_State_AUSR_Access_Road_Map.pdf PetroShare_State_AUSR_Operations_Plans.pdf PetroShare_State_Location_Map.pdf

---

Good morning Christine,

We have reviewed the attached documents and have the following comments:

- ERP pg. 4 – The gps coordinates do not appear to be for the site access. Please provide the correct coordinates for the access off of East 152nd Avenue in addition to the site coordinates.
- ERP pg. 4 - The emergency number for us should be 911. Having the non-emergency line in this section may be confusing.
- ERP pg. 5 – The non-emergency number for us should be 3032881535.
- The ERP submitted is a helpful resource for your employees and responder, however in order to better aid our responders we are requesting an overview document or summary card that contains the information that may be referenced quickly by our personnel. This document should be site specific and a copy should be provided to us to be kept in the responding fire apparatus. The summary card should include the following at a minimum:
    a. The facility name, address, and gps coordinates of the site access
    b. Site map showing pertinent information such as:
        i. Access roads
        ii. Site layout
        iii. Nearby residences (within 3,000 feet)
        iv. Nearby businesses (within 3,000 feet)
    c. Response resource contact info
        i. PetroShare
        ii. State, federal, and municipal responders
        iii. Response contractors
    d. Critical receptors in the area listed and shown on site map
    e. Well pad liquid storage statistics (oil and water)

Thank you!

Whitney Even
Fire Marshal
Brighton Fire Rescue District
500 S. 4th Ave. 3rd Floor
Brighton, CO 80601
303-659-4101
www.brightonfire.org

From: Christine Dougherty [mailto:CDougherty@adcogov.org]
Sent: Monday, November 5, 2018 8:01 AM
To: Even, Whitney <weven@brightonfire.org>; Michael McIntosh <MMcIntosh@adcogov.org>; Richard Atkins <RAtkins@adcogov.org>
Subject: Adams County CED Request for Comments - USR2018-00008

Request for Comments

Case Name:	PetroShare - State Well Pad
Project Number:	USR2018-00008

October 31, 2018

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

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

This request is located at approximately southeast of Powhaton Road and 152nd Avenue.

The Assessor's Parcel Number is 0156700000051.

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 November 21, 2018 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 cdougherty@adcogov.org.

The complete Use by Special Review Permit application can be found at www.adcogov.org/planning/currentcases.

Additional Oil and Gas information can be found at www.adcogov.org/oil-and-gas-information.

Thank you for your review of this case.

Christine Dougherty
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 | cdougherty@adcogov.org www.adcogov.org

COLORADO
Parks and Wildlife
Department of Natural Resources

Northeast Regional Office
6060 Broadway
Denver, CO 80216
P 303.291.7227 | F 303.291.7114

November 19, 2018

Christine Dougherty
Adams County
Oil & Gas Liaison, Community and Economic Development Department
4430 South Adams County Parkway, Suite W2000A
Brighton, CO 80601-8216

RE: Request for a Use by Special Review Permit to allow sixteen (16) horizontal well on one (1) well pad for the production of oil and gas (Case Number USR2018-00008)

Dear Ms. Dougherty:

Thank you for the opportunity to comment on the proposed 6.3-acre PetroShare State 16-21 well pad, consisting of one well pad with up to sixteen wells, and one access road for the production of oil and gas located southeast of Powhaton Road and East 152nd Avenue, Assessor's Parcel Number 0156700000051, in Adams County. The mission of Colorado Parks and Wildlife (CPW) is to perpetuate the wildlife resources of the state, to provide a quality state parks system, and to provide enjoyable and sustainable outdoor recreation opportunities that educate and inspire current and future generations to serve as active stewards of Colorado's natural resources. Our goal in responding to land use proposals such as this is to provide complete, consistent, and timely information to all entities who request comment on matters within our statutory authority.

District Wildlife Manager Serena Rocksund recently analyzed the project sites. The project location is surrounded by agricultural lands, residential single-family homes, and existing oil and gas wells. Although development of the 6.3-acre well pad and access road is not within sensitive wildlife habitat, the site is proposed in rural agricultural lands and does hold value as wildlife habitat. The main impacts to wildlife from this development include fragmentation and loss of habitat.

Fragmentation of wildlife habitat has been shown to impede the movement of wildlife across the landscape. Open space areas are more beneficial to wildlife if they connect to other natural areas. The areas of wildlife habitat that most closely border human development show heavier impact than do areas on the interior of the open space. However, when open space areas are smaller in size, the overall impact of the fragmentation is greater (Odell and Knight, 2001). By keeping open space areas contiguous and of larger size the overall benefit to wildlife increases dramatically.

CPW would expect a variety of wildlife species to utilize this site on a regular basis, most notably, small to mid-sized mammals, songbirds, and raptors. The potential also exists for large mammals such as deer and pronghorn to frequent this site. Raptors and other migratory

Bob D. Broscheid, Director, Colorado Parks and Wildlife • Parks and Wildlife Commission: Robert W. Bray • Matthew Burkett • Charles Garcia • Marie Haskett
Carrie Besnette Hauser • John Howard, Chair • Marvin McDaniel • Colleen Peppler • Jennifer Rieke Taylor • James Vigil, Secretary • Michelle Zimmerman, Vice-Chair

birds are protected from take, harassment, and nest disruption at both the state and federal levels. If an active nest is discovered within the development area, CPW recommends that buffer zones around nest sites be implemented during any period of activity that may interfere with nesting season. This will prevent the intentional or unintentional destruction of an active nest.

For further information on this topic, a copy of the document "Recommended Buffer Zones and Seasonal Restrictions for Colorado Raptors," is available from your local District Wildlife Manager or located at https://cpw.state.co.us/Documents/WildlifeSpecies/LivingWithWildlife/RaptorBufferGuidelines2008.pdf.
Following the recommendations outlined in this document will decrease the likelihood of unintentional take through disturbance.

If a prairie dog colony is discovered within the project area, the potential may also exist for the presence of burrowing owls. Burrowing owls live on flat, treeless land with short vegetation, and nest underground in burrows dug by prairie dogs, badgers, and foxes. These raptors are classified as a state threatened species and are protected by both state and federal laws, including the Migratory Bird Treaty Act. These laws prohibit the killing of burrowing owls or disturbance of their nests. Therefore, if any earth-moving will begin between March 15th and October 31st, a burrowing owl survey should be performed. Guidelines for performing a burrowing owl survey can also be obtained from your local District Wildlife Manager or located at https://cpw.state.co.us/Documents/WildlifeSpecies/LivingWithWildlife/RecommendedSurveyOwls.pdf

If prairie dog colonies are present, CPW would recommend they either be captured alive and moved to another location or humanely euthanized before any earth-moving occurs. The possibility of live-trapping and donating to a raptor rehabilitation facility may also exist. If interested, please contact the local District Wildlife Manager. Be aware that a permit and approval from county commissioners may be required for live relocation.

CPW recommends all site lights be motion-activated and downward-directed to minimize light pollution for active nocturnal or resting diurnal wildlife species.

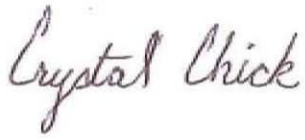
If fencing is to be installed, CPW recommends the installation of an exclusionary fence, at least six-feet in height plus 2 strands of top wire, to prevent deer form accessing the station. CPW recommends a smooth top to the fence (e.g., no top barbed wire or exposed metal rods) to prevent wildlife from impaling themselves or entanglement if they attempt to cross into the facility. The bottom of the fence shall be four inches or less from the ground. CPW has developed a document, https://cpw.state.co.us/Documents/LandWater/PrivateLandPrograms/FencingWithWildlifeInMind.pdf, to assist with choosing the correct type of fencing to allow or restrict wildlife movement.

CPW recommends consideration be made for using principles of an integrated weed management plan, which Adams County may already have in place, to control and eliminate the spread of any noxious weeds in and around the site. CPW recommends that the planting of any species listed as noxious weeds be avoided throughout the development site and surrounding area. The spread and control of noxious weeds on the sites is a concern for

wildlife in the immediate and surrounding area. Weeds are defined as “a plant that interferes with management objectives for a given area of land at a given point in time” (Whitson, 1999). Invasive plants endanger the ecosystem by disturbing natural processes and jeopardizing the survival of native plants and the wildlife that depend on them. The threat is so severe in the United States that scientists now agree that the spread of invasive species is one of the greatest risks to biodiversity (Nature Conservancy, 2003).

Thank you again for the opportunity to comment on the proposed PetroShare State 16-21 well pad located southeast of Powhaton Road and East 152nd Avenue, in Adams County. Please do not hesitate to contact us again about ways to continue managing the property in order to maximize wildlife value while minimizing potential conflicts. If you have any further questions, please contact District Wildlife Manager Serena Rocksund at (303) 291-7132 or serena.rocksund@state.co.us.

Sincerely,



Crystal Chick
Area 5 Wildlife Manager

Cc: M. Leslie, T. Kroening, S. Rocksund

November 26, 2018

Christine Dougherty
Adams County Community and Economic Development
4430 South Adams County Parkway, Suite W2000A
Brighton, CO 80601

RE: PetroShare State Well Pad, USR2018-00008
TCHD Case No. XXXX

Dear Ms. Dougerty,

Thank you for the opportunity to review and comment on the Use by Special Review Permit to allow sixteen (16) horizontal wells on one well pad for the production of oil and gas located southeast of Powhaton Road and 152nd Avenue. 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 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.

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 commends the applicant for including dust mitigation and erosion control measures in their application. 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 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 County

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

Please feel free to contact me at 720-200-1585 or aheinrich@tchd.org if you have any questions.

Sincerely,

Annemarie Heinrich, MPH/MURP
Land Use and Built Environment Specialist

cc: Sheila Lynch, Monte Deatrich, TCHD

Submitted via email to: cdougherty@adcogov.org

November 7, 2018

Christine Dougherty
Community and Economic Development Department
4430 South Adams County Parkway, Suite W2000Bs
Brighton, CO 80601-8218

Re: Case No. AUSR2018-00008

Dear Christine Dougherty:

The Colorado Department of Public Health and Environment has the following comments on the November 5, 2018 PetroShare State Well Pad request for comment (Case No. AUSR2018-00008).

The Department respectfully recommends that PetroShare employ best management practices throughout the project area and is providing comments on the following topics:

- Electrical equipment and devices
- Odors from drilling and completion activities
- Management of exploration and production waste
- Installation of pipelines
- Plugging and abandonment

Electrical equipment and devices

The Department recommends that PetroShare utilize electrical equipment and devices to the extent practicable in order to reduce emissions from diesel and natural gas powered equipment and devices.

Odors from drilling and completion activities

The Department supports PetroShare commitment to comply the Air Quality Control Commission's, Regulation No. 2 to reduce odor emissions. The Department recommends that PetroShare implement methods and practices to reduce odors

during each phase of the exploration and production process throughout the duration of the project, including but not limited to: using chillers and chemicals to mask or neutralize hydrocarbon odors emulating from drilling mud; using a squeegee to remove drilling fluids from the drilling pipe as they exit the wellbore and; using covered containers to store the drilling mud on the well site and; minimizing the use of diesel fuels as additives in drilling mud.

Management of exploration and production waste

The Department supports PetroShare commitment to dispose of exploration and production waste, including cuttings, in an approved disposal site. The Department recommends that PetroShare test for and properly dispose of technologically enhanced naturally occurring radioactive materials (TENORM).

Installation of pipelines

The Department recommends that PetroShare not commence commercial production of any well until adequate pipeline takeaway capacity is available at the facility. This practice ensures that green completions will be utilized to the extent practicable during flowback operations and that the flaring of natural gas will be minimized, thus reducing emissions from well sites.

Minimization of Flaring

The project area is within the Denver Metro/North Front Range (DMNFR) ozone nonattainment area. The flaring of natural gas produces nitrogen oxides (NOx) as well as additional volatile organic compound (VOC) emissions due to incomplete combustion. Both pollutants contribute to ozone formation.

In 2008, EPA came out with a stricter ozone standard and the DMNFR was designated as a “Marginal” nonattainment area for this standard. Although Colorado’s air quality is getting better, meeting the 2008 ozone standard continues to be a challenge.

The Department recommends that PetroShare limit the use of flares to the extent practicable in order to facilitate emission reduction efforts.

Plugging and abandonment

The Department recommends that PetroShare implement measures to control unnecessary and excessive venting during plugging and abandonment operations to protect public health and the environment, and to ensure that vapors and odors from well plugging operations do not constitute a nuisance or hazard to public welfare.

Conclusion

The Department appreciates the opportunity to submit these comments and as this project develops over the coming months, the Department may submit additional

comments in an effort to minimize the impacts from oil and gas operations on public health and the environment.

Please contact Sean Hackett at 303-692-3662 with any questions.

Sincerely,

Sean Hackett
Environmental Protection Specialist
Colorado Department of Public Health and Environment

EXHIBIT 3.3
Applicant Response to Comments

	Adams County **Community and Economic Development Department Development Review Comments**			
	Case Number: USR2018-00008			**Case Name: State**
	Applicant: PetroShare			**Date Initiated: 11/28/2018**
Referral Comment No.	**Mapped?**	**Reviewer Initials**	**County Comment**	**Applicant Response** (date)
1		CD	No Comment	PetroShare Corp has read and acknowledged the email received from Andrew D Chitiea. 12/12/2018

Referral Agency Comments:

Brighton Fire Rescue:

1. ERP pg. 4 – The gps coordinates do not appear to be for the site access. Please provide the correct coordinates for the access off of East 152nd Avenue in addition to the site coordinates.

2. ERP pg. 4 - The emergency number for us should be 911. Having the non-emergency line in this section may be confusing.

3. ERP pg. 5 – The non-emergency number for us should be 3032881535.

4. The ERP submitted is a helpful resource for your employees and responder, however in order to better aid our responders we are requesting an overview document or summary card that contains the information that may be referenced quickly by our personnel. This document should be site specific and a copy should be provided to us to be kept in the responding fire apparatus. The summary card should include the following at a minimum:
    1. The facility name, address, and gps coordinates of the site access
    2. Site map showing pertinent information such as:
        i. Access roads
        ii. Site layout
        iii. Nearby residences (within 3,000 feet)
        iv. Nearby businesses (within 3,000 feet)
    3. Response resource contact info
        i. PetroShare
        ii. State, federal, and municipal responders
        iii. Response contractors
    4. Critical receptors in the area listed and shown on site map
    5. Well pad liquid storage statistics (oil and water)

PetroShare Corp's Response

- Updates to ERP have been made and the edited version is attached
- A document summarizing the Brighton Fire Rescue requests is attached

Colorado Parks and Wildlife: CPW has identified the site as a potential habitat for a variety of different mammals and bird species and has provided recommendations accordingly.

1. If a raptor or other migratory bird nest is identified and active then it is recommended that, a buffer is implemented to prevent intentional or unintentional destruction of the nest.
2. If a prairie dog colony is discovered within the project area, the potential for burrowing owls also exist, and CPW has provided guidelines for performing surveys, best times for earth –moving activities, and general guidance if the colony is still active.
3. Recommend all site lights be motion –activated and downward directed.
4. Fence guidelines are provided, but they will need to be reviewed by staff prior to implementing the recommendations.
5. CPW recommends a weed management plan to prevent the spread of noxious weeds.
6. A complete copy of the comments is attached for your review.

PetroShare Corp's Response

- With regards to the letter submitted by Colorado Parks & Wildlife; PetroShare understands and agrees to conduct operations according to the guidelines laid out in the instances of a raptors and/or migratory birds, prairie dog or burrowing owl presence.
- Lighting will be directed as such to minimize light pollution and also maximize effectiveness for the work area. Motion activated lights will be considered

for the Production phase.

- PetroShare Corp will be mindful and avoid the planting or spreading of noxious weeks on or around the site.

Tri-County Health:

1. If an On-site Wastewater Treatment System is used then a permit will be required from Tri-County Health.
2. 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.
    a. That the County or applicant notify owners of the wells or groundwater rights owners of the proposed application;
    b. 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
    c. That the County refers well owners desiring guidance for wellhead protection to TCHD.
3. Tri-County is requesting to review information regarding the source of water for workers as well as any proposed potable water systems used by workers.
4. Non-potable water stored on site should be marked accordingly.
5. Secondary containment must be provided for all on site fuel storage.

PetroShare Corp's Response

- With regards to requests above:
    1. There will not be on-site wastewater treatment
    2. PetroShare Corp will work with the County as necessary regarding groundwater owners rights and is complying with state regulations for pre operational water well testing.
    3. The water for workers will be provided by contractors and not by PetroShare Corp directly and as such PetroShare Corp does not have information water source or potable water systems to be used
    4. Non-potable water will be marked as such
    5. Secondary containment for on site fuel storage will meet COGCC and County requirements

CDPHE:

1) Recommend the utilization of electrical equipment and devices to the extent practical in order to reduce emissions.
2) CDPHE recommends the use of chiller and chemicals to mask or neutralize hydrocarbon odors emulating from drilling mud; using a squeegee to remove drilling fluids from drilling pipe, and covered containers to store drilling mud on site, an d minimize the use of diesel fuels as additives in drilling mud.
3) Test for and properly dispose of TENORM
4) Recommend the use of pipelines to support green completions and reduce the possibility of flaring.
5) The facility is located in DMNFR non-attainment area and recommends limited use of flares.
6) Implement measures to control unnecessary and excessive venting during plugging and abandonment operations.

PetroShare Corp's Response

- With regards to the 6 BMPs outlined in the CDPHEs letter; PetroShare Corp agrees that these are reasonable and will be implemented as a part of our operations whenever feasible and/or required.
    6. Electrical equipment and devices
    7. Odors from drilling and completion activities
    8. Management of exploration and production waste
    9. Installation of pipelines
    10. Minimization of Flaring
    11. Plugging and abandonment

County Staff:

1) Landscape review:
   - **a.** PLN1. The proposed landscape plan does not conform to the requirements of Section 4-16 of the Adams County Development Standards and Regulations. **A re-submittal is required.**
   - b. PLN2. A minimum of 10% lot landscape is required. In addition, buffer areas with trees and shrubs are required for lesser intensity uses (residential) and along right-of-way (E. 152nd Ave). A minimum of 75% living plant material is required with a maximum of 25% non- living landscape.
   - c. PLN3. Please include the setbacks of the well locations from all property lines and the nearest right-of-way, residential structures, etc.
   - d. PLN4. Screen fencing is required. Please include proposed fence details (height, location, material).
   - e. PLN5. The irrigation method is required on the landscape plan (i.e. drip system, water truck, etc).

PetroShare Corp's Response

- New landscaping plans and a Cultural Items plat are attached and address the requests from the Landscaping review.

2) Case Manager:
   - a. Applicant is required to provide baseline well water testing of any registered residential water wells within ½ mile of the proposed oil and gas wells or production facility upon request of the owner. Has the applicant received any request for baseline testing? If no residential wells will be tested due to request by the owner, what wells has the applicant identified to test to be compliant with COGCC regulations?

     PetroShare Corp has not received any residential requests for baseline testing. We have identified the following wells for testing and will seek access from well owners to do so:

     Tim Stensvad
     Permit Number 215482
     Aquifer – Upper Arapahoe
     Depth – 450'

     Colin & Dona Woods
     Permit Number 218705
     Aquifer – Upper Arapahoe
     Depth – 390'

     Frank Lallas
     Permit Number 142430
     Aquifer – Lower Dawson
     Depth – 440'

     Tomas Solis
     Permit Number 218754
     Aquifer – Upper Arapahoe
     Depth – 450'

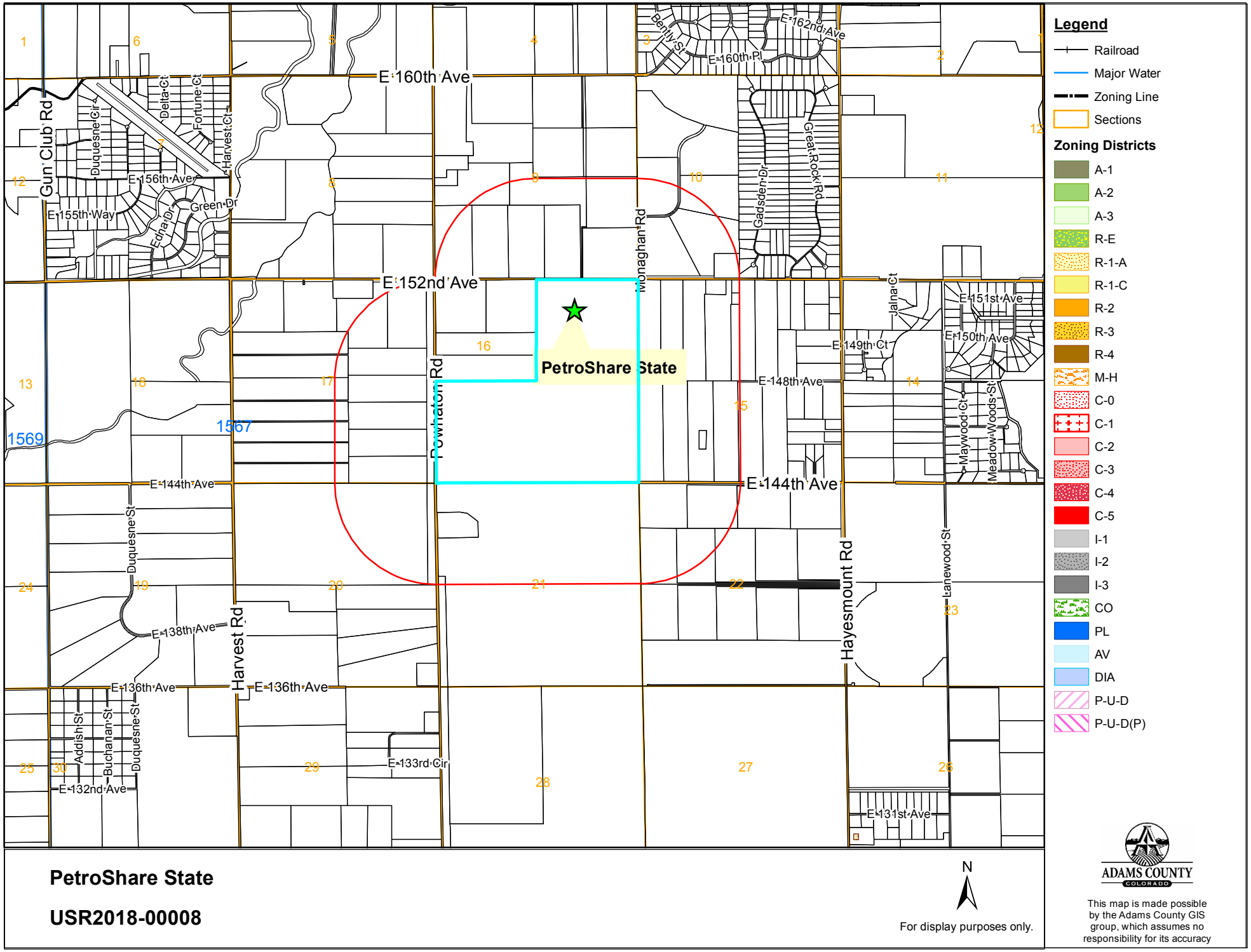
   - b. Where are the minerals that are being developed located? Section, Township and Range is adequate.
     1S 65W Sections 16 & 21
   - c. Where is the required water being sourced? Will the water be trucked in, piped in, or sourced on site?
     We have confirmed that FRICO (Farmers Reservoir and Irrigation Co will lease water to PetroShare via Barr Lake. It will be transported to the pad one of two ways; fast lined or trucked in to the pad.
   - d. Where is produce water being disposed?
     Produced water will be disposed of in an NGL disposal well in T1N R67W or T1N R66W

e. Will produced water be trucked off site or piped off site?
Produced water will be trucked off site

f. Will any existing oil and gas wells located within the defined drilling unit be plugged and abandoned because of this new facility?
Not that PetroShare is aware of at this time.

g. The written summary states that pipelines will terminate at the sales point meter(s), who will be responsible for bringing pipe to the facility? Will that section of the pipe be permitted and constructed under this AUSR application? If yes, please provide information
PetroShare Corp is currently negotiating pipeline agreements. The midstream company will build pipe to the facility and will also negotiate access and ROW as required.

EXHIBIT 4.1
Notification Map



PetroShare State

USR2018-00008

N

For display purposes only.

Legend

- Railroad
- Major Water
- Zoning Line
- Sections

Zoning Districts

- A-1
- A-2
- A-3
- R-E
- R-1-A
- R-1-C
- R-2
- R-3
- R-4
- M-H
- C-0
- C-1
- C-2
- C-3
- C-4
- C-5
- I-1
- I-2
- I-3
- CO
- PL
- AV
- DIA
- P-U-D
- P-U-D(P)

ADAMS COUNTY
COLORADO

This map is made possible by the Adams County GIS group, which assumes no responsibility for its accuracy

EXHIBIT 4.2
Notification Mailing Labels

2661 ECLIPSE WATKINS LLC
C/O ELIZABETH C MILLER
13103 E FLORIDA PL
AURORA CO 80012-5313

ADAMS COUNTY
4430 S ADAMS COUNTY PKWY 5TH FLOOR
BRIGHTON CO 80601-8222

ADAMS COUNTY
4430 SOUTH ADAMS COUNTY PKWY
BRIGHTON CO 80601-8204

ADERHOLT FRANK M AND
ADERHOLT MARY Q
PO BOX 535
WATKINS CO 80137-0535

AIR METHODS CORP
5500 S QUEBEC ST SUITE 300
GREENWOOD VILLAGE CO 80111

AIR SPRAYERS INC
PO BOX 12
TWO BUTTES CO 81084-0012

AIR SPRAYERS, INC
RON DROSSELMEYER
PO BOX 12
TWO BUTTES CO 81084-0012

ALBI JOSEPH R AND
ALBI SHAROLYNN D
PO BOX 370754
DENVER CO 80237-0754

ALVARADO DONALD H AND ALMA D
31606 BROADMOOR DR
EVERGREEN CO 80439

ASTRA REALTY LLC
C/O MICHAEL J WILLIAMS
10154 RIDGEGATE CIR
LONE TREE CO 80124-5538

BALDWIN MARVIN
6255 PINE HOLLOW DRIVE
PARKER CO 80134

BARANWAY JOHN B
35500 E COLFAX AVE APT H-1
WATKINS CO 80137-9008

BARANWAY JOHN B AND
BARANWAY PHYLLIS K
35500 E COLFAX AVE NO H-1
WATKINS CO 80137-9014

BARANWAY JOHN B AND
BARANWAY PHYLLIS K
35500 E COLFAX AVE NO H1
WATKINS CO 80137-9014

BARBO WALTER
12579 E CEDAR AVE
AURORA CO 80012-1304

BEA HANGARS LLC
13465 W 7TH DR
LAKEWOOD CO 80401-4611

BENESCH EDWARD J
PO BOX 86
WATKINS CO 80137-0086

BENNETT FIRE PROTECTION
DISTRICT NO 7
825 SHARI S COURT
BENNETT CO 80102-7804

BLACK ANDREW J AND
LEW-BLACK KAREN J
16516 LAS BRISAS DR
BROOMFIELD CO 80023-8071

BLACKMON DAVID G
40392 E ARIZONA AVE
BENNETT CO 80102-8434

BLUE SKIES AVIATION LLC
C/O ROBERT EHLINGER
78 KAILA PL
KIHEI HI 96753-6517

BRISTOL BAY CAPITAL LLC
37451 BEECHCRAFT WAY APT 1
WATKINS CO 80137-7134

BRONCO PIPELINE COMPANY
34501 E QUINCY AVE BLDG 1
WATKINS CO 80137-9303

BROOKHAVEN PROPERTIES 1 LLC
10049 SOUTHLAWN CIR
COMMERCE CITY CO 80022-8850

BROOKHAVEN PROPERTIES INC
10049 SOUTHLAWN CIR
COMMERCE CITY CO 80022-8850

BROOKLYN LLC
5441 GOLDEN CURRANT WAY
PARKER CO 80134-2708

BUCK MICHAEL AND
BUCK MAUREEN MUZEK
PO BOX 1838
ELIZABETH CO 80107-1838

BUFFALO AVIATORS LLC
8541 IOWA PL
DENVER CO 80231-2741

BURLACE THOMAS JOSEPH AND
BURLACE DEBORAH ANN
3592 S VENTURA WAY
AURORA CO 80013

CARLSON GEORGE B AND
CARLSON MARY F
7561 KELTY TR
FRANKTOWN CO 80116

CHELSEA INVESTMENTS LLC
5700 S QUEBEC ST STE 102
GREENWOOD VILLAGE CO 80111-2009

CHESTER STEVEN GEORGE
7454 S COOLIDGE WAY
AURORA CO 80016-5231

CLEAN ENERGY COLLECTIVE, LLC
4430 S ADAMS COUNTY PKWY 5TH FLOOR
LOUISVILLE CO 80027-1288

CLEM WILLIAM B III
PO BOX 330
WATKINS CO 80137-0330

CLEM WILLIAM B III
MARK SCHUBERT
PO BOX 330
WATKINS CO 80137-0330

CO LAND ACQUISITIONS LLC
1551 BANNOCK ST
DENVER CO 80204

COLORADO AIRCRAFT HANGARS LLC
C/O BILLY J WATKINS
16300 YOSEMITE STREET
BRIGHTON CO 80602

COLORADO AIRCRAFT HANGARS LLC
24795 KOLSTAD LOOP
ELBERT CO 80106

COLORADO SHARED SOLAR I LLC
211 CARNEGIE CTR
PRINCETON NJ 08540-6213

CONOCOPHILLIPS COMPANY
34501 E QUINCY AVE BLDG 1
WATKINS CO 80137-9303

CROSS COUNTRY PIPELINE SUPPLY
2420 URAVAN ST
AURORA CO 80011

DENVER ROCK ISLAND RAILROAD
3400 E 56TH AVE
COMMERCE CITY CO 80022-3620

DENVER SCHOOL DISTRICT NO 1
780 GRANT STREET
DENVER CO 80203

DIEHL AND ASSOCIATES LLC
346 BEREA 4
JEFFERSON TX 75657-6524

DILLOW ERIC AND DILLOW STACY
13725 W AUBURN AVE
LAKEWOOD CO 80228

DODD ARHTUR E AND
DODD WILMA B
3316 KLONDIKE PLACE
CASTLE ROCK CO 80108

DOUGLASS DONALD R AND
DOUGLASS LINDA K
6870 FOX CREEK TRL
FRANKTOWN CO 80116-9670

DUNNING DAN C
2555 PIGGOTT ROAD
STRASBURG CO 80136

DYE DAVID O AND DYE CHERYL A
4101 IMBODEN MILE RD/BOX 36
WATKINS CO 80137-0036

E AND E INVESTMENTS INC
C/O DAVID ENGBRECHT
34450 E 25TH AVE
WATKINS CO 80137-7135

EAGLE HANGAR I CONDO ASSOCIATION
C/O PHILLIP RUTHERFORD
649 MONROE ST
DENVER CO 80206-4450

EHMANN CARL FRANK AKA EHMANN KARL FRANK AND
LAKEY LESTER L/EHMANN FLOYD R REVOCABLE TRUST
7574 JUNIPER STREET
ARVADA CO 80007

EL CHUCHO LLC
C/O STAN PETERS
5926 S JASMINE STREET
ENGLEWOOD CO 80111

ELEVATION MIDSTREAM LLC
370 17TH ST STE 5300
DENVER CO 80202-5653

ELLIOTT JAMES C AND
ELLIOTT DIANA L
12974 N TOMAHAWK ROAD
PARKER CO 80138

EPPERSON GAYLE L
3906 S KALISPELL ST
AURORA CO 80013-2727

EXECUTIVE AIR EAST
PO BOX 749
WATKINS CO 80137-7179

EXPLORCO LLC
C/O STEVEN R DAVIS AND AMELIA Y DAVIS
4058 HISTEAD WAY
EVERGREEN CO 80439-8433

FIELDHAND AVIATION LLC
SPAUR CHUCK
3911 S ELKHART ST
AURORA CO 80014-4112

FISCHER DALE
12510 E ILIFF AVE SUITE 300
AURORA CO 80014

FISHER FLOYD R SR TRUSTEE OF THE
FISHER FLOYD SR REVOCABLE TRUST THE
PO BOX 815
HIGLEY AZ 85236-0815

FLOYD KATHLEEN R
4511 ABILENE ST
DENVER CO 80239-4973

FRONT RANGE AIRPORT EXECUTIVE
HANGAR NO 1 CONDO ASSOC INC
PO BOX 74
WATKINS CO 80137-0074

FRONT RANGE CO LLC
101 HODENCAMP RD STE 200
THOUSAND OAKS CA 91360-5835

FRONT RANGE CONDO 2 HANGAR ASSN
GAIL JENSEN
13632 SHILOH DR
FRANKTOWN CO 80116

FRONT RANGE HANGAR 19 CONDOMINIUM ASSOCIATION
SONNY HIGNITE
7 E PARK
UNIVERSAL CITY TX 78148-5646

FRONT RANGE HANGAR 20 CONDOMINIUM ASSN
DIANE MARS
3400 E 56TH AVE
COMMERCE CITY CO 80022-3620

FRONT RANGE HANGER 8 LLC
RICHARD BACON
280 OLIVE ST
GOLDEN CO 80401-8562

FTG HANGAR CONDO VII
FRANK DIEHL
PO BOX 12
TWO BUTTES CO 81084-0012

FTG1 HANGER CONDOMINIUM ASSOCIATION
JERRY BALLARD
PO BOX 2548
EVERGREEN CO 80437-2548

GATES JAY C UND 1/2 INT AND HOLLENDORFER
FREDERICK C/KONECNY DONA M UND 1/2 INT
500 YOSEMITE WAY
DENVER CO 80230-6540

GILMAN ERNEST BRUCE
PO BOX 8
WESTON CO 81091-0008

GMJ FAMILY TRUST
7025 S ANDES CIR
CENTENNIAL CO 80016

GUSTTE PHILIP O
8511 THUNDERBIRD RD
PARKER CO 80134-5724

HANGAR ENTERPRISES LLC
5927 SADDLE CREEK TR
PARKER CO 80134

HANGAR SPACE LLC
C/O PEGGY LONG
PO BOX 65
BLACK HAWK CO 80422-0065

HAYES DAVID M
PO BOX 270042
LITTLETON CO 80127

HB1 LLC
12342 MEADOWLARK LN
DENVER CO 80239-3123

HIGNITE SONNY J
1910 BALTIMORE DR
ALLEN TX 75002-2624

HOFFMANN JEROME AND
HOFFMANN GREGORY
7428 S OGDEN WAY
CENTENNIAL CO 80122-1473

HOWELL NICHOLAS A
4001 S CHERRY ST
ENGLEWOOD CO 80113-5082

HOWELL NICK AND MITCHELL MATT AND
COLVIN CLU
1550 S DE GAULLE CIR
AURORA CO 80018-6025

HUGHBANKS JAMES B
PO BOX 646
EVERGREEN CO 80437

IRWIN ANDREW J
6044 S MEADOWLARK PL
CASTLE ROCK CO 80109

IRWIN ANDREW J
6044 S MEADOWLARK PLACE
CASTLE ROCK CO 80104

IVANY HUGH SCOTT AND
IVANY KARI L
7017 S NETHERLAND WAY
AURORA CO 80016-2347

JARVI KENNETH
9138 E STAR HILL LN
LONE TREE CO 80124-5404

JENSEN ART AND
JENSEN GAIL
13632 SHILOH DR
CONIFER CO 80433-5134

JENSEN TERRYL KAYNE TRUST 50% INT AND
JENSEN VICKI D LIVING TRUST THE 50% INT
1565 GENESEE RIDGE RD
GOLDEN CO 80401-8000

JOHNSON CARL R TRUST THE
C/O MELLANY GODWIN
6420 S NEWCASTLE WAY
AURORA CO 80016-2496

JOHNSON JAMES
7399 CALHOUN
BYERS CO 80103

JOHNSON MARK M AND
JOHNSON SHARON S
PO BOX 141
WATKINS CO 80137-0141

JONES JAMES
8643 W 64TH WAY
ARVADA CO 80004-3219

JONES JOYCE A
10448 REMMICK RIDGE ROAD
PARKER CO 80134

KAMERRA LLC
1250 S BUCKLEY RD UNIT I-246
AURORA CO 80017-4150

KASTENHOLZ DAGMAR
9151 SUGARSTONE CIR
WATKINS CO 80137-7132

KLV INVESTMENTS LLC
4495 W LINDBERGH WAY
CHANDLER AZ 85226-4731

KOOKEN THOMAS AND
WOTOVITCH MICHAEL ERIK
783 S YOUNGFIELD CT
LAKEWOOD CO 80228-2812

KOONTZ DENNIS E AND
KOONTZ CELESTE N
2552 E TERRARIDGE DRIVE
HIGHLANDS RANCH CO 80126

L SQUARED PROPERTIES LLC
6825 E HAMPTON AVE SUITE 200
DENVER CO 80224

LARSON LANNY J AND LARSON DEBORAH L TRUSTEES
OF THE
LARSON REVOCABLE TRUST
15 RAINBOW VALLEY RD
PLACITAS NM 87043-8800

LEE BRIAN AND LEE SAMANTHA AND
POCH ARTHUR L
1932 S OAKLAND ST
AURORA CO 80014-1129

LEMON RICHARD A
2519 MIDDLETON BEACH RD
MIDDLETON WI 53562-2912

LIFSEY WALT
800 YORK ST
DENVER CO 80206-3750

LONG MARK D
4959 BAYOU HILLS RD
PARKER CO 80134-5156

LOPEZ ANTONIO ALBERTO AND
LOPEZ ALBERTO ANTONIO
18961 E KENT CIR
AURORA CO 80013-3635

LOWELL BRET I
19520 E DICKENSON PL
AURORA CO 80013

LUECK RODNEY W AND
LUECK LISA E
PO BOX 749
MORRISON CO 80465-0749

MAES ROBERT E JR AND
MAES LINDA
PO BOX 85
WATKINS CO 80137-0085

MC CLAIN BETTY S AND
MC CLAIN NEIL L
3375 SOUTH ASH STREET
DENVER CO 80222-7254

MC DEAL INVESTMENTS LLLP
3333 E FLORIDA AVE APT 60
DENVER CO 80210-2518

MC GOVERN THOMAS F
2285 BEACHAM DRIVE
CASTLE ROCK CO 80104

MC INTOSH THOMAS E AND
MC INTOSH PEGGY S
2500 FAIRPLAY WAY
AURORA CO 80011-2999

MC MILLAN R SCOTT
21957 MOUNTSFIELD DR
GOLDEN CO 80401-8822

METHVEN MARIANNE
3405 PECAN PARK DR
FLOWER MOUND TX 75022

MICHAEL JEFFREY B AND
WOODS ERIK K
23522 GLENMOOR DRIVE
PARKER CO 80138

MOLBERG LEONARD W AND
MOLBERG JUDITH A
13184 ROBINS DR
DENVER CO 80239-3720

MONAGHAN FARMS INC
DELINE THOMAS
7950 E PRENTICE AVE STE 101
GREENWOOD VILLAGE CO 80111-2723

MORALES-ALEJANDRO HERIBERTO UND 62.5 % AND
AYALA ROBERT AKA AYALA-ROSADO ROBERTO UND 37
.5%
1143 LEWISTON ST
AURORA CO 80011-7415

MORTENSON AVIATION LLC
14250 COUNTY ROAD 166
KIOWA CO 80117-9608

MP AVIATION INVESTMENTS LLC
JAY MELVEY
3155 CHAMBERS RD UNIT A
AURORA CO 80011-1320

MUTZIG STEVEN M
PO BOX 520
WATKINS CO 80137

MY HANGAR LLC
22 CHERRY LANE DR
ENGLEWOOD CO 80113-4232

NAIMAN HAROLD E
703 DOWNING STREET
DENVER CO 80218

NELSON AERO SERVICE LLC
37701 E 51ST AVE
WATKINS CO 80137

NELSON AERO SERVICE LLC
13860 E HAMPDEN PLACE
AURORA CO 80014

NELSON DON
C/O STEVE DAVIS
8631 E YALE AVE APT F
DENVER CO 80231-4052

NELSON DON
13860 E HAMPDEN PL
AURORA CO 80014-4137

NELSON DONALD
13860 E HAMPDEN PLACE
AURORA CO 80014

NORLOFF RICH
12342 MEADOWLARK LN
BROOMFIELD CO 80021-4199

NORLOFF RICHARD W
H190 CONDO ASSN
C/O ROBIN MORTENSON
KIOWA CO 80117-9608

NORLOFF RICHARD W
12342 MEADOWLARK LN
BROOMFIELD CO 80021-4199

O MALLEY SUZANNE LOUISE
11586 EAST STALLION DRIVE
PARKER CO 80138

ON-AIR FAMILY LLC
1776 E TUFTS AVENUE
ENGLEWOOD CO 80113

PARK JE KYUNG
1557 PEORIA ST
AURORA CO 80010-2829

PARK JOONG HO AND
PARK KYO OK
5415 S HANNIBAL COURT
CENTENNIAL CO 80015

PASCHKE STEPHEN J
11543 W BRIARWOOD DR
LAKEWOOD CO 80226-3711

PEGASUS AVIATION LLC
ZILIK GARY P
13342 S OMAHA ST
PINE CO 80470-9519

PENNEY JOHN C AND
PENNEY STEPHANIE A
30141 STOWE CT
EVERGREEN CO 80439-9421

PERARO THOMAS A
2524 S DAWSON WAY
AURORA CO 80014

PERARO THOMAS A
2524 S DAWSON WAY
AURORA CO 80014-2414

PETERSON VIRGIL E AND
PETERSON HELEN M
PO BOX 187
WATKINS CO 80137-0187

PRAIRIE VIEW PROPERTY
OWNERS ASSOCIATION
PO BOX 96
WATKINS CO 80137-0096

PRENTICE WILLIAM S
15461 FAIRWAY DR
COMMERCE CITY CO 80022-5221

PROSPER FARMS INVESTMENTS LLC
5641 BROADWAY
DENVER CO 80216-1021

PUBLIC SERVICE CO OF COLORADO
C/O PROPERTY AND LOCAL TAXES
PO BOX 1979
DENVER CO 80201-1979

R AND D AIRCRAFT LLC
1025 BECKY DRIVE
COLORADO SPRINGS CO 80921

REAMEY JAMES R JR AND
REAMEY SENIA N
188 N BUCHANAN CT
AURORA CO 80018-1545

RH CHUAPOCO INVESTMENTS LLC
PO BOX 460850
AURORA CO 80046-0850

RHOADS MITCHEL E
4755 W 30 N
ANGOLA IN 46703-8725

RICHMAN MARCIA A REVOCABLE TRUST ET AL
3040 KOEPKE RD
NORTHBROOK IL 60062-5820

RIOPELLE J F
1011 S VALENTIA ST UNIT 2
DENVER CO 80247-6813

RMI AVIATION INC
4655 COLORADO BLVD
DENVER CO 80216-3217

ROBSON RYAN E
1863 ASOKA ST
STRASBURG CO 80136-7708

RUEHLE JANE L AND
RUEHLE WALTER J
14000 E PROGRESS WAY
AURORA CO 80015-1116

SCHUBERT MARK
ATTN MARK SCHUBERT
PO BOX 130
WATKINS CO 80137-0130

SCHUBERT MARK J AND
MACKE RONALD J
PO BOX 130
WATKINS CO 80137-0130

SENN DAVID M
SENN DONNA M
7138 S ULSTER ST
CENTENNIAL CO 80112-1847

SNEED ROBERT E
330 JASMINE STREET
DENVER CO 80220-5915

ST JOHN THE BAPTIST SERBIAN
ORTHODOX CHURCH
9305 W CEDAR AVE
LAKEWOOD CO 80226-1045

STATE OF COLORADO DEPARTMENT OF
MILITARY AFFAIRS
6848 S REVERE PKWY
ENGLEWOOD CO 80112-6709

STATHOPULOS ATHANASEA CONSTAN
4014 S NIAGARA WAY
DENVER CO 80237

STEWY LLC
595 CIRCLE DR
DENVER CO 80206-4112

STRICKLIN ROY L
PO BOX 74
WATKINS CO 80137-7134

SULLIVAN MARILOIS
PO BOX 185
WATKINS CO 80137-0185

SUNDINE ALBERT REED AND
SUNDINE CAROLE DIANNE
15928 QUARRY HILL DR
PARKER CO 80134

T-83 COMPLEX WINDCHASER CONDOMINIUM
CLARK ERIKA T
9961 CHAMBERS DR
COMMERCE CITY CO 80022-9328

TAYLOR DAVID R
9351 ROADRUNNER ST
HIGHLANDS RANCH CO 80129-6408

THOMPSON ROBERT M AND
THOMPSON JILL M
10686 E DORADO PLACE
ENGLEWOOD CO 80111

THOMPSON ROBERT M AND
THOMPSON JILL M
8547 E ARAPAHOE ROAD NO. J-424
GREENWOOD VILLAGE CO 80112

TOVAR EQUIPMENT SOLUTIONS INC
3886 IRELAND CT
DENVER CO 80249-8108

TRUONG TONY
4812 POLO CT
PUEBLO CO 81001-1071

TWS AVIATION FUEL SYSTEMS
BOB THOMPSON
8547 E ARAPAHOE ROAD #J-424
ENGLEWOOD CO 80112

VAN DYK GERRIT A/DOROTHY M AS TRUSTEES
VANDYK GERRIT A/DOROTHY M JT REVOC TRUST
920 ANTELOPE DR W
BENNETT CO 80102-8676

VANCE GARY M AND
VANCE DEBRA L
2545 HASKELL PL
WATKINS CO 80137-7138

VES LLC
7036 NEWCOMBE ST
ARVADA CO 80004-1438

VW AIRCRAFT HANGAR LLC
C/O ROBERT E VENOHR
4037 S SABLE CIR
AURORA CO 80014-5177

WATKINS DEVELOPMENT ASSOCIATES LLC
1207 ASCOT AVE
LITTLETON CO 80126-3057

WATKINS STORAGE COMPANY LLC
1565 GENESEE RIDGE RD
GOLDEN CO 80401-8000

WEBSTER RON
PO BOX 7
WATKINS CO 80137-0007

WEBSTER RONALD C
ASSOCIATION INC
PO BOX 7
WATKINS CO 80137-0007

WEBSTER RONALD C SR REV TRUST 50%
WEBSTER RONALD C JR/JUDY C 50% INT
2105 ROBB ST
LAKEWOOD CO 80215-1252

WEBSTER RONALD C SR UND 1/2 INT AND
WEBSTER RONALD C JR/JUDY C UND 1/2 JT
PO BOX 7
WATKINS CO 80137-0007

WEP TRANSPORT HOLDINGS LLC UND 80% AND
COLORADO MAVERICK COMPANY LLC 20%
PO BOX 7068
RANCHO SANTA FE CA 92067-7068

WESTERN TRANSPORT LLC UND 58.76% AND TREE TO P LP AND
LP UND 21.24% AND COLORADO MAVERICK COMPANY LLC UND 20%
625 E MAIN ST STE 1028-303
ASPEN CO 81611-1935

WIEBOLD ROBERT T
5187 SAGE THRASHER RD
PARKER CO 80134-2738

WOLFF CHRISTINE
16 S NOME ST UNIT D
AURORA CO 80012-1272

WOODS KENNETH
7733 SCHUMAKER RD
BENNETT CO 80102

ZUNDEL DANA J
PO BOX 2908
HOMER AK 99603

ADAMS JORDAN AND
ADAMS ANYA
OR CURRENT RESIDENT
2993 FOUNTAIN HILL CT
WATKINS CO 80137-7116

AGNEW R ROGER AKA AGNEW RAYMOND R
OR CURRENT RESIDENT
4100 ECLECTIC ST
WATKINS CO 80137-7163

AVIATOR BAR & GRILL
OR CURRENT RESIDENT
5200 FRONT RANGE PKWY
WATKINS CO 80137-7172

BARGER JOSEPH M
OR CURRENT RESIDENT
2982 HASKELL CT
WATKINS CO 80137-7113

BISWURM GENEVIEVE K
OR CURRENT RESIDENT
2805 HASKELL CT
WATKINS CO 80137-7112

BOWMAN JOHN E AND
BOWMAN BIAMA E
OR CURRENT RESIDENT
2283 HASKELL WAY
WATKINS CO 80137-7139

BRADEN NICHOLAS AND
BRADEN JUSTINE
OR CURRENT RESIDENT
33992 E 29TH AVE
WATKINS CO 80137-6717

BREWER FORREST L AND
BREWER VIDA L
OR CURRENT RESIDENT
33955 E 25TH AVE
WATKINS CO 80137-7143

BRINKOETER RHONDA K
OR CURRENT RESIDENT
2585 HASKELL PL
WATKINS CO 80137-7138

CARMICHAEL BRETT M
OR CURRENT RESIDENT
2752 GENTRY COURT
WATKINS CO 80137

CARY DANIEL M JR AND
CARY HOLLY J
OR CURRENT RESIDENT
2875 HASKELL CT
WATKINS CO 80137-7112

COOP OLIVER A AND JOANNE L REVOCABLE TRUST T
HE
OR CURRENT RESIDENT
2294 HASKELL WAY
WATKINS CO 80137-7139

DOWD MICHAEL T AND
DOWD MEGAN E
OR CURRENT RESIDENT
33850 E 25TH AVE
WATKINS CO 80137

EBERHARD BRIAN AND EBERHARD CAROL
OR CURRENT RESIDENT
2583 GENTRY PLACE
WATKINS CO 80137

ENGBRECHT DAVID AND
ENGBRECHT JENNIFER
OR CURRENT RESIDENT
34450 E 25TH AVE
WATKINS CO 80137-7135

ENNIS CHIZUKO
OR CURRENT RESIDENT
2963 FOUNTAIN HILL COURT
WATKINS CO 80137

FOX DALE AND FOX PRISCILLA
OR CURRENT RESIDENT
2952 FOUNTAIN HILL CT
WATKINS CO 80137-7116

FREIBERG WILLIAM E AND
FREIBERG JONI E
OR CURRENT RESIDENT
2563 GENTRY PLACE
WATKINS CO 80137

GAGNON PAUL D AND
GAGNON CHERYL L
OR CURRENT RESIDENT
2681 ECLIPSE ST
WATKINS CO 80137-7177

GARCIA ALEJANDRO
OR CURRENT RESIDENT
3295 IMBODEN RD
WATKINS CO 80137-8901

GUE ALTON E JR
OR CURRENT RESIDENT
2680 ECLIPSE ST
WATKINS CO 80137

HALTOM ALAN AND
HALTOM TIFFANY
OR CURRENT RESIDENT
37800 CESSNA WAY HNGR 4E
WATKINS CO 80137-7186

HANLEY PETER J AND
HANLEY VIVIAN C
OR CURRENT RESIDENT
2962 HASKELL CT
WATKINS CO 80137-7113

HASTINGS ROBERT E
OR CURRENT RESIDENT
2950 ECLECTIC CT
WATKINS CO 80137-7117

HORVATH TIBOR AND
HORVATH VICTORIA
OR CURRENT RESIDENT
2263 HASKELL WAY
WATKINS CO 80137

JAGMIN GENE T
OR CURRENT RESIDENT
2971 HANOVER COURT
WATKINS CO 80137

JOHNSON GREGORY N AND
JOHNSON LESLEE T
OR CURRENT RESIDENT
2542 GENTRY PLACE
WATKINS CO 80137

JONES LARRY K
OR CURRENT RESIDENT
2882 GENTRY CT
WATKINS CO 80137

KEMERLING ADAM AND
KEMERLING TAWNY LIN
OR CURRENT RESIDENT
2861 ECLIPSE ST
WATKINS CO 80137-7146

LE VEQUE GREGORY M AND PAMELA J
OR CURRENT RESIDENT
2584 HASKELL PL
WATKINS CO 80137

LOPEZ JAVIER
OR CURRENT RESIDENT
1960 CAVANAUGH RD
WATKINS CO 80137-6700

LORENZ ERIC
OR CURRENT RESIDENT
2274 HASKELL WAY
WATKINS CO 80137-7139

LUHRSEN LARS F AND
LUHRSEN COURTNEY B
OR CURRENT RESIDENT
33952 E 29TH AVE
WATKINS CO 80137-6717

MARTIN FAMILY TRUST THE
OR CURRENT RESIDENT
2505 HASKELL PLACE
WATKINS CO 80137

MARTIN STACEY AND
MARTIN LORI
OR CURRENT RESIDENT
2983 HASKELL CT
WATKINS CO 80137-7113

MELLECKER LINDA L TRUSTEE/MELLECKER
LINDA L REVOCABLE TRUST THE
OR CURRENT RESIDENT
2373 HASKELL WAY
WATKINS CO 80137-7139

METSKER CARL E AND
METSKER JOAN F
OR CURRENT RESIDENT
2943 FOUNTAIN HILL CT
WATKINS CO 80137

MEWALDT JAMES R AND
MEWALDT RUTH A
OR CURRENT RESIDENT
2970 ECLECTIC CT
WATKINS CO 80137-7117

MEYERS ROBERT W
OR CURRENT RESIDENT
2544 HASKELL PLACE
WATKINS CO 80137

MOLER THERESE M/GREG D 51% INT AND
MOLER THERESE M 49% INT
OR CURRENT RESIDENT
34090 E 25TH AVE
WATKINS CO 80137

NELLIGAN DAVID K
OR CURRENT RESIDENT
2972 FOUNTAIN HILL CT
WATKINS CO 80137-7116

NORDAHL GARY L AND
NORDAHL RUTH E
OR CURRENT RESIDENT
2981 HANOVER COURT
WATKINS CO 80137

OCAMPO HERNANDEZ GERARDO
OR CURRENT RESIDENT
2254 HASKELL WAY
WATKINS CO 80137-7139

OGDEN TERRY L AND
OGDEN SALLY A
OR CURRENT RESIDENT
33752 E 29TH AVE
WATKINS CO 80137-6718

OLSON JOHN RICHARD AND
OLSON CINDY RAE
OR CURRENT RESIDENT
2860 ECLIPSE ST
WATKINS CO 80137-7146

PERSON JOHN F AND
PERSON JANIE L
OR CURRENT RESIDENT
2991 ECLECTIC CT
WATKINS CO 80137-7117

PESCH HENRY J AND
PESCH CYNTHIA A
OR CURRENT RESIDENT
2951 HANOVER CT
WATKINS CO 80137-7114

PORTER CRAIG R
OR CURRENT RESIDENT
2881 GENTRY CT
WATKINS CO 80137-7115

RAMSDELL MARK G AND
RAMSDELL CAROL J
OR CURRENT RESIDENT
34150 E 25TH AVE
WATKINS CO 80137

REMPFER EPHRAIM
OR CURRENT RESIDENT
2244 HASKELL WAY
WATKINS CO 80137-7139

RESCH PAT P AND
RESCH JEANNE M
OR CURRENT RESIDENT
34250 E 25TH AVE
WATKINS CO 80137-7141

REYNOLDS WILLIAM B AND
REYNOLDS MARY R
OR CURRENT RESIDENT
2504 HASKELL PL
WATKINS CO 80137-7138

RICE MERRI-LYN
OR CURRENT RESIDENT
2950 HANOVER CT
WATKINS CO 80137-7114

ROHDE TERRY L AND
ROHDE PATRICIA S
OR CURRENT RESIDENT
34251 E 25TH AVE
WATKINS CO 80137

SCHOFIELD FELIX R AND
SCHOFIELD ERICA M
OR CURRENT RESIDENT
34050 E 25TH AVE
WATKINS CO 80137-7137

SEWILL SEAN M AND
DARLING-SEWILL KIMBERLY L
OR CURRENT RESIDENT
2772 GENTRY CT
WATKINS CO 80137-7115

SMALLEY KARLAND H AND
SMALLEY TRACEY A
OR CURRENT RESIDENT
33980 E 40TH AVE
WATKINS CO 80137

SNELL CHESTER LAWRENCE AND
SNELL LINDA M
OR CURRENT RESIDENT
2565 HASKELL PL
WATKINS CO 80137-7138

SOUTHWELL CAREY IRENE AND
SOUTHWELL CHARLES MARK
OR CURRENT RESIDENT
2953 HASKELL CT
WATKINS CO 80137-7113

SPENCER REBECCA J KEITH
OR CURRENT RESIDENT
2874 HASKELL CT
WATKINS CO 80137-7112

STERNER ELLEN AND
HARPER WILLIAM LAMAR
OR CURRENT RESIDENT
2774 HASKELL CT
WATKINS CO 80137-7166

TEMPLETON BEN H AND
TEMPLETON GARNETT F
OR CURRENT RESIDENT
33950 E 25TH AVE
WATKINS CO 80137-7196

TRI-PAC AVIATION LLC
OR CURRENT RESIDENT
37625 ASTRA WAY
WATKINS CO 80137-7179

WEBSTER RONALD C JR AND
WEBSTER JUDY C
OR CURRENT RESIDENT
37350 ASTRA WAY
WATKINS CO 80137-7199

WILLIAMS RICHARD L AND
WILLIAMS AMY L
OR CURRENT RESIDENT
2543 GENTRY PL
WATKINS CO 80137-7118

WINTERS CHARLES A
OR CURRENT RESIDENT
2990 ECLECTIC CT
WATKINS CO 80137-7117

CURRENT RESIDENT
37400 ASTRA WAY
WATKINS CO 80137-7105

CURRENT RESIDENT
37700 ASTRA WAY UNIT 1
WATKINS CO 80137-7106

CURRENT RESIDENT
37700 ASTRA WAY UNIT 2
WATKINS CO 80137-7106

CURRENT RESIDENT
37550 ASTRA WAY HNGR 3E
WATKINS CO 80137-7111

CURRENT RESIDENT
2804 HASKELL CT
WATKINS CO 80137-7112

CURRENT RESIDENT
2992 HASKELL CT
WATKINS CO 80137-7113

CURRENT RESIDENT
2977 FOUNTAIN HILL CT
WATKINS CO 80137-7116

CURRENT RESIDENT
2552 GENTRY PL
WATKINS CO 80137-7118

CURRENT RESIDENT
37700 CESSNA WAY HNGR 6E
WATKINS CO 80137-7120

CURRENT RESIDENT
37835 ASTRA WAY
WATKINS CO 80137-7121

CURRENT RESIDENT
34195 E 48TH AVE
WATKINS CO 80137-7126

CURRENT RESIDENT
37801 E 51ST AVE HNGR 1E
WATKINS CO 80137-7132

CURRENT RESIDENT
37801 E 51ST AVE HNGR 2E
WATKINS CO 80137-7132

CURRENT RESIDENT
37801 E 51ST AVE HNGR 2W
WATKINS CO 80137-7132

CURRENT RESIDENT
37451 BEECHCRAFT WAY HNGR 2
WATKINS CO 80137-7134

CURRENT RESIDENT
37451 BEECHCRAFT WAY HNGR 3
WATKINS CO 80137-7134

CURRENT RESIDENT
4101 IMBODEN RD
WATKINS CO 80137-7136

CURRENT RESIDENT
2372 HASKELL WAY
WATKINS CO 80137-7139

CURRENT RESIDENT
33900 E 40TH AVE
WATKINS CO 80137-7148

CURRENT RESIDENT
34100 E 40TH AVE
WATKINS CO 80137-7153

CURRENT RESIDENT
37401 BEECHCRAFT WAY
WATKINS CO 80137-7158

CURRENT RESIDENT
37600 CESSNA WAY
WATKINS CO 80137-7161

CURRENT RESIDENT
37550 ASTRA WAY HNGR 4E
WATKINS CO 80137-7171

CURRENT RESIDENT
37550 ASTRA WAY HNGR 5E
WATKINS CO 80137-7171

CURRENT RESIDENT
37550 ASTRA WAY UNIT 2E
WATKINS CO 80137-7171

CURRENT RESIDENT
37650 ASTRA WAY
WATKINS CO 80137-7179

CURRENT RESIDENT
37550 ASTRA WAY HNGR 1E
WATKINS CO 80137-7183

CURRENT RESIDENT
37800 CESSNA WAY HNGR 1E
WATKINS CO 80137-7186

CURRENT RESIDENT
37800 CESSNA WAY HNGR 2E
WATKINS CO 80137-7186

CURRENT RESIDENT
37800 CESSNA WAY HNGR 3E
WATKINS CO 80137-7186

CURRENT RESIDENT
37800 CESSNA WAY HNGR 6W
WATKINS CO 80137-7186

CURRENT RESIDENT
37800 CESSNA WAY UNIT 5W
WATKINS CO 80137-7186

CURRENT RESIDENT
37800 CESSNA WAY UNIT 6E
WATKINS CO 80137-7186

CURRENT RESIDENT
37700 CESSNA WAY HNGR 2W
WATKINS CO 80137-7194

CURRENT RESIDENT
37700 CESSNA WAY HNGR 1E
WATKINS CO 80137-7195

CURRENT RESIDENT
37700 CESSNA WAY HNGR 5W
WATKINS CO 80137-7195

CURRENT RESIDENT
5190 VIOLET HILL ST UNIT D
WATKINS CO 80137-7198

CURRENT RESIDENT
37900 CESSNA WAY HNGR B
WATKINS CO 80137-7204

CURRENT RESIDENT
37350 E 50TH AVE
WATKINS CO 80137-7206

CURRENT RESIDENT
37701 E 51ST AVE HNGR 1W
WATKINS CO 80137-7210

CURRENT RESIDENT
37701 E 51ST AVE HNGR 2W
WATKINS CO 80137-7210

CURRENT RESIDENT
5190 VIOLET HILL ST UNIT A
WATKINS CO 80137-7216

CURRENT RESIDENT
5190 VIOLET HILL ST UNIT B
WATKINS CO 80137-7216

CURRENT RESIDENT
5190 VIOLET HILL ST UNIT C
WATKINS CO 80137-7216

CURRENT RESIDENT
5190 VIOLET HILL ST UNIT E
WATKINS CO 80137-7216

CURRENT RESIDENT
5190 VIOLET HILL ST UNIT F
WATKINS CO 80137-7216

CURRENT RESIDENT
37800 ASTRA WAY HNGR 5W
WATKINS CO 80137-7218

CURRENT RESIDENT
37500 ASTRA WAY HNGR 3E
WATKINS CO 80137-7219

CURRENT RESIDENT
37850 CESSNA WAY HNGR 6E
WATKINS CO 80137-7703

CURRENT RESIDENT
35500 E COLFAX AVE SPC 32
WATKINS CO 80137-9002

CURRENT RESIDENT
35070 E COLFAX AVE
WATKINS CO 80137-9007

CURRENT RESIDENT
35500 E COLFAX AVE SPC 10
WATKINS CO 80137-9013

CURRENT RESIDENT
35500 E COLFAX AVE SPC 11
WATKINS CO 80137-9013

CURRENT RESIDENT
35500 E COLFAX AVE SPC 12
WATKINS CO 80137-9013

CURRENT RESIDENT
35500 E COLFAX AVE SPC 13
WATKINS CO 80137-9013

CURRENT RESIDENT
35500 E COLFAX AVE SPC 14
WATKINS CO 80137-9013

CURRENT RESIDENT
35500 E COLFAX AVE SPC 15
WATKINS CO 80137-9013

CURRENT RESIDENT
35500 E COLFAX AVE SPC 16
WATKINS CO 80137-9013

CURRENT RESIDENT
35500 E COLFAX AVE SPC 17
WATKINS CO 80137-9013

CURRENT RESIDENT
35500 E COLFAX AVE SPC 7
WATKINS CO 80137-9013

CURRENT RESIDENT
35500 E COLFAX AVE SPC 8
WATKINS CO 80137-9013

CURRENT RESIDENT
35500 E COLFAX AVE SPC 9
WATKINS CO 80137-9013

CURRENT RESIDENT
35500 E COLFAX AVE SPC 18
WATKINS CO 80137-9014

CURRENT RESIDENT
35500 E COLFAX AVE SPC 19
WATKINS CO 80137-9014

CURRENT RESIDENT
35500 E COLFAX AVE SPC 20
WATKINS CO 80137-9014

CURRENT RESIDENT
35500 E COLFAX AVE SPC 21
WATKINS CO 80137-9014

CURRENT RESIDENT
35500 E COLFAX AVE SPC 22
WATKINS CO 80137-9014

CURRENT RESIDENT
35500 E COLFAX AVE SPC 23
WATKINS CO 80137-9014

CURRENT RESIDENT
35500 E COLFAX AVE SPC 24
WATKINS CO 80137-9014

CURRENT RESIDENT
35500 E COLFAX AVE SPC 25
WATKINS CO 80137-9014

CURRENT RESIDENT
35500 E COLFAX AVE SPC 26
WATKINS CO 80137-9014

CURRENT RESIDENT
35500 E COLFAX AVE SPC 27
WATKINS CO 80137-9014

CURRENT RESIDENT
35500 E COLFAX AVE SPC 28
WATKINS CO 80137-9014

CURRENT RESIDENT
35500 E COLFAX AVE SPC 29
WATKINS CO 80137-9014

CURRENT RESIDENT
35500 E COLFAX AVE SPC 30
WATKINS CO 80137-9014

CURRENT RESIDENT
35500 E COLFAX AVE SPC 31
WATKINS CO 80137-9014

CURRENT RESIDENT
35500 E COLFAX AVE SPC 33
WATKINS CO 80137-9014

CURRENT RESIDENT
35500 E COLFAX AVE SPC 34
WATKINS CO 80137-9014

CURRENT RESIDENT
35500 E COLFAX AVE SPC 35
WATKINS CO 80137-9014

CURRENT RESIDENT
35500 E COLFAX AVE SPC 36
WATKINS CO 80137-9014

CURRENT RESIDENT
35500 E COLFAX AVE SPC 37
WATKINS CO 80137-9014

CURRENT RESIDENT
35500 E COLFAX AVE SPC 39
WATKINS CO 80137-9014

CURRENT RESIDENT
35500 E COLFAX AVE SPC 40
WATKINS CO 80137-9014

CURRENT RESIDENT
35500 E COLFAX AVE SPC 41
WATKINS CO 80137-9014

CURRENT RESIDENT
35500 E COLFAX AVE SPC 43
WATKINS CO 80137-9014

CURRENT RESIDENT
35500 E COLFAX AVE SPC 44
WATKINS CO 80137-9014

CURRENT RESIDENT
35500 E COLFAX AVE SPC 45
WATKINS CO 80137-9014

CURRENT RESIDENT
35500 E COLFAX AVE SPC 42
WATKINS CO 80137-9016