



February 20, 2017

Christopher Simmons  
4430 South Adams County Parkway  
1<sup>st</sup> Floor Suite W2000A  
Brighton, CO 80601

**RE: Adams County Case Number: USR2016-00007**

**HRM Resources II, LLC Alma Pad AUSR RE: Public Comments**

Mr. Simmons,

HRM Resources II, LLC is submitting this in response to Adams County staff and residents' comments made on the Alma Pad AUSR application (**Adams County Case Number: USR2016-00007**). If there are additional question or concerns please contact me using the information below.

**1. Staff has reviewed comment- referral was sent to CPW, however, staff received no referral comments:**

HRM Resources II, LLC completed a Natural Resources Conservation Overlay, (NRCO) Resource Review prior to submitting the AUSR application. The review found no significant habitat or resource values or impacts to habitat or wildlife on or near the proposed location. See section 15.1 of AUSR application for reference.

**2. Staff has reviewed comments and is evaluating how Conditionals of Approval (COAs) may be used to mitigate impacts:**

HRM Resources II, LLC (HRM), has submitted the 2A Oil and Gas Location Assessment to the Colorado Oil and Gas Conservation Commission for review. The 2A application contains a list of Best Management Practice (BMP's), used to mitigate impact of oil and gas development on the surrounding area. HRM also included these BMP's in the AUSR applications submitted to Adams County. HRM will continue to work with the County and State to incorporate additional BMP's that are reasonable and practical for this operation. HRM plans to incorporate all COGCC enforceable BMP's into the 2A application.

**3. Staff has reviewed comments. Section 6(c) of the Adams County Memorandum of Understanding provides property owners within ½ mile of the proposed Oil and Gas location the ability to request a one-time baseline water well test. Applicant should contact the operator to arrange aforementioned water well test. Staff is reviewing and evaluating how conditions of approval (COAs) may be used to mitigate impacts:**

HRM Resources II, LLC has signed the Adams County MOU and will meet all requirements agreed to in the agreement. This includes the testing of all water wells within one half (1/2) mile of the well locations. HRM will offer testing to all water well owners within the ½ miles buffer prior to spudding the first well.

**4. Emergency Preparedness Plan (EPP):**

HRM Resources II, LLC will revise EPP and resubmit to Adams County and Brighton Fire Protection District addressing each issue in the comment letter. HRM received a Will Serve letter from Whitney Means at Brighton Fire Protection District. –See Attachment



**5. The Denver International Airport (DEN) Planning Office Comments:**

1. The property lies approximately 14,316 ft (2.7 miles) northwest from the north end of existing Runway 16R at DEN.
2. The property falls within the Title 14 CFR Part 77 Navigable Airspace Surfaces associated with DEN. Should the proponent erect temporary construction equipment that is at least 200 ft. above ground level (AGL) the Federal Aviation Administration (FAA) would require the proponent to file an FAA Form 7460-1 (Notice of Proposed Construction or Alteration) in order to complete an FAA aeronautical study. See FAA Advisory Circular 70/7460-2K,

HRM Resources II, LLC has no plans to utilize permeant or temporary equipment that will meet the 200 ft. height requirement. In the event this changes HRM will obtain necessary permit from FAA prior to constructing and utilize such equipment.

**6. Tri-County Health:**

- a. Domestic Wastewater Management. Equipment and manpower will be at the site for a relatively brief period of time. When employees and contractors are on site, the operator will ensure that portable restrooms are available and are maintained on a rigorous schedule. The operation will not be extensive enough in scope and duration to require a septic or vault system.
- b. Baseline Water Quality Testing. The operator will offer baseline water quality testing to any property owner within ½ mile of the oil and gas location, at no cost to the property owner. The operator expects a number of property owners to request such sampling and that will result in the creation of a robust baseline water quality measurement. COGCC rules specify testing parameters for such testing.
- c. Water Supply for Use by Workers. The operator will ensure that all contractors and vendors provide fresh supplies of potable water on a daily basis when employees are on site.
- d. Potential Temporary Water Storage. All water storage tanks onsite will be signed as either potable or non-potable. Any water storage tanks on site will be small; the risk of collapse will be small, and any potential environmental impacts from a collapse would be insignificant.
- e. Above Ground Storage Tanks. Construction and operation of any storage tanks for fuel, condensate or crude will comply fully with all SPCC requirements, including secondary containment.
- f. Emergency Response Plan. The operator will comply fully with all SPCC requirements as well as with all COGCC, CDPHE, and EPA requirements with regard to spills. The operator also will put in place an extensive emergency response plan that addresses all foreseeable potential emergencies and necessary response actions.
- g. Air Quality Permitting. The operator will comply fully with all COGCC requirements regarding venting and flaring, and with all CDPHE air permitting requirements.
- h. Dust Control Mitigation. The operator and all contractors and vendors will employ Best Management Practices (BMPs), to minimize any dust in the area, and will comply with all COGCC interim and final reclamation requirements.
- i. Traffic Safety. The operator has proposed a traffic route that minimizes impacts to communities from all construction traffic. The operator also will require compliance with all traffic laws on the part of contractors and vendors.

Thanks,

Derek Petrie  
Regulatory Supervisor  
P: 720-420-5748  
M: 307-389-8350



## Brighton Fire Rescue District

500 S. 4<sup>th</sup> Ave, 3<sup>rd</sup> Floor • Brighton, Colorado 80601

Telephone: (303) 659-4101 • Fax: (303) 659-4103 • Website: [www.brightonfire.org](http://www.brightonfire.org).

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December 14, 2016

Nicholas Holland  
Aarden Consulting Group Ltd.

Subject: Will Serve Letter

Project: HRM Resources Alma Well Pad Site; 39.92893, -104.72228 (North of 128<sup>th</sup> between Piccadilly and Gun Club Road)

To Whom It May Concern:

The above named project is within the boundaries of the Brighton Fire Rescue District and will be served by the District. Fire protection and prevention services provided by the District will be according to applicable laws and District rules, regulations, and policies.

Please contact this office if you need further information or have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Whitney Means".

Whitney Means  
Deputy Fire Marshal  
[wmeans@brightonfire.org](mailto:wmeans@brightonfire.org)