October 17, 2017

Members of City Council
City and County of Broomfield
1 Descombes Dr.
Broomfield, CO 80020

Dear Members of City Council:

We provide this letter to officially state our position on the current plan proposed by Extraction Oil & Gas within your city. To be clear, Adams County strongly urges the City and County of Broomfield to work with Extraction to relocate the Interchange and Northwest well pads to locations north of the Northwest Parkway. There is abundant land north of the Northwest Parkway that is undeveloped and more suitable for oil and gas development than the current locations, which are directly abutting an established neighborhood that has been here since the 1960s and 1970s. In addition, the Northwest A and B well pads are located on open space that was specifically acquired to buffer this neighborhood from highway traffic when the Northwest Parkway was constructed. Placing oil and gas well pads on this open space is inappropriate, particularly given the fact that more suitable locations exist.

Adams County has made clear this position repeatedly within the last 30 days to the City and County of Broomfield staff, as well as to the City Council in a number of recent Council meetings. These interactions are summarized below, and the County’s correspondence on this matter is attached.

- September 19, 2017
  - Letter from Adams County BOCC to Broomfield urging Broomfield to pause negotiations (see attached)
- September 26, 2017
  - Testimony provided by Adams County staff and Adams County Commissioner Steve O’Dorisio at the Broomfield City Council meeting (see attached)
- September 29, 2017
  - Meeting between Adams County staff and Broomfield staff. Attendees included Adams County Manager Raymond Gonzales, Adams County Deputy County Manager Bryan Ostler, Adams County Department Director Kristin Sullivan, Senior Env. Analyst Jennifer Rutter, Oil & Gas Liaison Chris
LaMere, Broomfield Deputy City and County Manager Kevin Standbridge, Broomfield Assistant City and County Manager Jennifer Hoffman, Broomfield Local Government Designee and Director of Strategic Initiatives Tami Yellico. At this meeting, Adams County staff made it clear that all of the well locations south of the Northwest Parkway were deeply concerning and should be relocated.

- October 4, 2017
  - Coordination phone call between Adams County staff and Broomfield staff
- October 10, 2017
  - Testimony provided by Adams County staff and prepared for Adams County Commissioner Chaz Tedesco at the Broomfield City Council meeting (see attached)
- October 11, 2017
  - Coordination phone call between Adams County staff and Broomfield staff
- October 12, 2017
  - In-person meeting between Adams County Manager Raymond Gonzales, City & County Manager Charles Ozaki, and Adams County Deputy County Manager Bryan Ostler (see attached proposal from Adams County delivered at this meeting)
- October 13, 2017
  - In-person meeting between Adams County staff, City & County of Broomfield staff, and Extraction Oil & Gas representatives.
  - At this meeting, Adams County staff again made it abundantly clear that Adams County’s position was to relocate the Interchange and Northwest well pads north of the Northwest Parkway utilizing current industry best practices and technology to access minerals from appropriate surface locations.

Adams County continues to have deep concerns about the current proposal. The surface locations proposed by Extraction Oil & Gas for these well bores are profoundly inappropriate considering the other options available. Large tracts of undeveloped land are abundantly available north of the Northwest Parkway and should be utilized for the proposed large-scale oil and gas development, rather than the currently proposed locations, which are upon designated open space that was acquired by the City and County of Broomfield to act as a natural buffer between nearby residential development and new highway traffic created when the Northwest Parkway was developed.

The setbacks and number of wells per pad recommended by Broomfield’s Oil and Gas Comprehensive Plan Update Committee resulted in unintended consequences since these recommendations did not take into consideration the existing neighborhood across the border in Adams County or treat higher density development differently than single residences. The result is that Extraction has proposed far too many surface locations in close proximity to
residential neighborhoods. This proposal is in complete opposition to the intent of the taskforce process, as well as industry advancements that allow reduced surface locations and the ability to access minerals from locations farther from developed areas.

We strongly urge you to hold off on approving the proposed Memorandum of Understanding with Extraction Oil & Gas and to require the operator to identify more appropriate surface locations north of the Northwest Parkway.

Sincerely,

Eva J. Henry
Chair

Charles “Chaz” Tedesco

Erik Hansen

Steve O’Dorisio

Mary Hodge
September 19, 2017

Mayor of Broomfield and City Council Members:

It has come to our attention that Extraction Oil & Gas, LLC (Extraction), with the guidance of Broomfield’s Oil and Gas Comprehensive Plan Update Committee, proposes relocation of up to 99 oil and gas wells along the Adams County border, near residential homes.

Due to the impact of the proposed location on neighboring Adams County families, the Board of County Commissioners request the City and County of Broomfield pause considering the current proposal and include Adams County in the discussion and reconsider the location of the wells.

We look forward to working with you as a good neighbor to ensure the protection of the health, safety, and welfare of all families.

Sincerely,

Commissioner Eva J. Henry, District 1
Commissioner Charles “Chaz” Tedesco, District 2
Commissioner Erik Hansen, District 3
Commissioner Steve O’Dorisio, District 4
Commissioner Mary Hodge, District 5
September 26, 2017

Good evening, Mayor and City Council Members,

My name is Chris LaMere and I am the Oil & Gas Liaison for Adams County. Thank you for giving me the chance to speak this evening.

I would like to read the letter our Commissioners sent to you last Tuesday in response to the newly proposed locations:

'It has come to our attention that Extraction Oil & Gas, with the guidance of Broomfield’s Oil and Gas Comprehensive Plan Update Committee, proposes relocation of up to 99 oil and gas wells along the Adams County border, near residential homes.

'Due to the impact of the proposed location on neighboring Adams County families, the Board of County Commissioners request the City and County of Broomfield pause considering the current proposal and include Adams County in the discussion and reconsider the location of the wells.

'We look forward to working with you as a good neighbor to ensure the protection of the health, safety, and welfare of all families.

'Sincerely,
' The Adams County Board of Commissioners

As an update on communications since this letter was sent a week ago, we have made contact with Broomfield staff in an effort to set up a meeting to discuss the updated plans for Extraction’s oil and gas facilities, which were revealed at last week’s city council meeting. However, we have not yet had the opportunity to meet.

To date, there has not been any meaningful engagement to the Adams County staff or the Adams County residents who would be the most impacted by the recommendations of this proposal. This week, we inquired with the Broomfield staff regarding any outreach efforts to Adams County representatives or our residents and they referenced a single email that went to our five elected commissioners notifying them of the start of the stakeholder process on April 18, 2017. In our opinion, this single email does not adequately address the goals of interjurisdictional coordination as outlined in Section 5. of the Resolution Declaring the Intent of the City & County of Broomfield to Engage in a Comprehensive Planning Process for Oil & Gas Operations within the City, which reads:
Section 5. The City and County will reach out to its neighboring jurisdictions, including Boulder County, Adams County, Weld County and the Cities of Westminster, Thornton, Dacono, Northglenn and Erie requesting that they make the requests in Section 3 above for purposes of interjurisdictional coordination as discussed in Section 9.

We remain concerned about the lack of engagement and outreach to our residents who should have a voice in this proposal. We urge you to pause this proposal until we can work together to craft a more inclusive outreach process that includes Adams County residents.
My name is Kristin Sullivan, Director of Community & Economic Development for Adams County. Two weeks ago, our staff attended your last meeting on this topic and expressed a desire to be included at the table. Since that date, we have met with your staff once in person and once over the phone, and we have now set up regular coordination calls. However, I’m here tonight to express the fact that we have significant remaining concerns with the proposed plans.

We still have deep concerns about the Northwest A, Northwest B, and both Interchange well pads. These pad sites are on the south side of the Northwest Parkway, immediately adjacent to an existing residential neighborhood. The planned access for these sites would go through existing open space that was intended to buffer the residents from the Northwest Parkway. The related traffic, noise, air quality, and construction impacts that the development of the well pads will cause is deeply troubling.

The current proposal goes against the spirit of the Taskforce’s work and their recommendations, as these sites are not locations that would have the least amount of impact to existing neighborhoods.

The well pad sizes and the associated setbacks developed by the Taskforce have resulted in unintended consequences of spreading the well pad sites over a greater area, thus impacting more residents.

We strongly encourage the Council to consider consolidating more of the small well pads into single sites to reduce the overall surface impacts and eliminate sites in the backyards of established neighborhoods. There are innovations in the industry that allow more minerals to be accessed from fewer sites and these principles and best practices are not being fully utilized in this proposal. **Our action items that we ask of you tonight are:**

1) Relocate the Interchange and Northwest well pads north of the Northwest Parkway
2) Consolidate wells into fewer pad sites to reduce impacts to residents
3) Move the pipeline north of the Northwest Parkway, farther from existing homes
4) Allow more time for collaboration with Adams County residents, staff, and officials to work together to find the best solutions possible
Good evening and thank you for the opportunity to speak to you tonight. I am Adams County Commissioner Chaz Tedesco.

Adams County is very concerned about the Extraction proposal and its impact on Adams County residents. After nearly of year of stakeholder engagement specifically targeted to Broomfield residents, it was revealed publicly for the first time on September 19th that that current Extraction proposal now places the majority of the wells along the Adams County border, which poses a significant, long-lasting impact on an established neighborhood that was not included or notified of this change until only a week ago. We have been in discussion with Broomfield officials and staff for the last two weeks, and while we appreciate their willingness to hear our concerns, this has not been nearly enough time to work through the many issues that this proposal presents to our community.

Among the various concerns we have are the following:

- By placing so many wells south of the Northwest Parkway directly adjacent to homes, the current approach prioritizes the needs of future development over that of existing neighborhoods and families.

- The area of land to the south of Northwest Parkway and north of 156th Avenue was designated to serve as a buffer between Northwest Parkway and the residents along 156th Avenue; large scale oil and gas development in this “buffer” area is contrary to the City and County of Broomfield’s past commitment to these residents and Adams County.

- The current proposal is contrary to COGCC and industry best practices, which generally attempt to consolidate wells onto fewer pads to minimize surface impacts and locate large-scale wells pads as far from existing homes as possible.

- The current site plan would require a haul route directly behind homes for the construction of 49 wells. This equates to 50,000 truck trips through construction, completion, and reclamation. It would also require that the
pipeline to transport the oil and gas be located on the south side of the Northwest Parkway, placing it closer to homes and existing development.

- The current sites were not contemplated in the Broomfield taskforce alternative site analysis work and this new plan does not include some of the most highly rated sites.

- The first and only neighborhood meeting that Adams County residents have been invited to is planned for Friday, October 13th. If the Council is planning to approve this MOU on October 24th, this is not nearly enough time to address concerns raised in this upcoming meeting.

- For the first time, we have learned from reading tonight’s Council packet that the City and County of Broomfield will receive approximately $12 million from this proposal through royalties, lease payments, and the acquisition of easements. However, the residents most impacted by the current plan will be Adams County residents, not Broomfield residents, and the public benefits to those residents are not clear.

**Actions:**

The Extraction plan needs significant changes to be compatible with the surrounding area. Specifically:

- Relocate pads to a location north of the Northwest Parkway
- Relocate the pipeline north of the Northwest Parkway

It has recently come to our attention that at least one of the proposed sites was purchased with Adams County Open Space dollars and the change in use may require approval by the Adams County Commissioners. We will need time to work through these issues and identify solutions.

We appreciate the relationship we have with the City and County of Broomfield and ask that you postpone the approval of this MOU until we can work together on a plan that is better for all parties.
1) Relocate as many well pads as possible north of the Northwest Parkway

2) Consolidate wells into fewer pad sites to reduce impacts to residents

3) Move the pipeline north of the Northwest Parkway

4) Allow more time for collaboration with Adams County residents, staff, and officials to work together to find the best solutions possible
October 12, 2017

Charles Ozaki
City Manager
City & County of Broomfield
1 Descombes Dr
Broomfield, CO 80020

Dear Charles,

Thank you for taking the time to speak with us about this important matter. We believe that we have the same goal here and that is to minimize the impacts of oil and gas development for our residents and neighborhoods. The Huron and United well pads are preferred sites, but we understand that working with McWhinney has proven to be difficult and could take more time. We have put together a proposal that utilizes the existing Nordstrom Open Space. Our plan is mutually beneficial to both jurisdictions and has the following benefits:

- Increased setbacks from existing residences that have been here since the 1970s and 1980s.
- Traffic to be located on an existing road in a more appropriate area that the open space between the Northwest Parkway and the established neighborhoods to the south.
  - Extraction could be required to improve roadway, install shoulders, turn lanes, stop lights, etc. based upon the recommendations of a traffic study.
- Better truck traffic access and flow onto the highways.
- Less surface disturbance, less infrastructure to maintain, less visual impact during construction as well as the long-term impacts during the production phases.
- Maintains the promise made to the Mustang Acres neighborhood for an open space buffer between their homes and the Northwest Parkway.
- Takes into account the timing of development, where the well pads will go in and drilling will occur prior to surface development.

Important details:

- If Nordstrom Open Space is chosen as a well pad location and all of the wells were moved north of the Northwest Parkway, it is likely that Adams County would look favorably to changing the approved use of the parcel purchased with Adams County Open Space dollars.
- The setbacks recommended by the stakeholder process are arbitrary and have resulted in unintended outcomes.
  - Agencies, such as the COGCC, establish setbacks based upon density of residences so that urban areas are treated differently than a rural dwelling on a large lot.
  - The setbacks are not regulatory and should be considered as one factor of many in a site selection process that includes many additional considerations.
- The risk of explosions has been put forward as the basis for the setbacks. The chance of a well blow out is the same on a 1-well pad and an 8-well pad and a 32-well pad. Major explosion potential results from on-site storage of produced oil and water. However, Extraction has proposed the use of a pipeline and would avoid that potential hazard.
- Laterals used to access the minerals from the Huron and United well pads were sufficient, so our proposed pad locations could also be used to access those same minerals. Current horizontal drilling technologies allow access to minerals up to three miles from the surface location.
- We are concerned about applying the residential setback recommendations of the Taskforce to the fire station. The North Metro Fire Station, where firefighters work 48-hour shifts, is significantly different from a residence, where families with children live full time and enjoy outdoor spaces such as backyards, etc.

Please let us know your thoughts about this proposal and whether it makes sense. We recommend that we convene a meeting with Adams County, Extraction, and the City and County of Broomfield to collaborate on a solution.

Sincerely,

Raymond H. Gonzales
County Manager