

#1

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Thursday, November 14, 2019 10:22:29 AM
Last Modified: Thursday, November 14, 2019 11:35:43 AM
Time Spent: 01:13:13
IP Address: 73.243.83.218

Page 1

Q1 Are you associated with a group or organization that will be providing comments to this questionnaire? **No**

Q2 Do you have detailed suggestions to add, remove or modify anything in Section 17. 1. - Intent and Purpose?

No

Q3 Do you have detailed suggestions to add, remove or modify anything in Section 17.2. - Required Process and Permits?

Should there be a new zoning in Larimer County for oil/gas wells and well production sites? Future zoning could change, but a record of this zoning must be maintained so that future purchasers would know the history of this land.

Q4 Please share your opinion on 17.3. - Standards Required for all Oil and Gas Facilities.

General	Generally Like(Needs Clarification or Improvement)
Air Quality	Generally Like(Needs Clarification or Improvement)
Leak Detection and Repair	Generally Like(Needs Clarification or Improvement)
Spills and Releases	Dislike
Well Liquids Unloading	Dislike
Noise	Generally Like(Needs Clarification or Improvement)
Odors	Dislike
Dust	Generally Like(Needs Clarification or Improvement)
Access	Dislike
Chemical Handling	Generally Like(Needs Clarification or Improvement)
Recycle, Reuse and Disposal of Fluids	Generally Like(Needs Clarification or Improvement)
Water Bodies	Dislike
Visual	Generally Like(Needs Clarification or Improvement)
Well Plugging and Abandonment	Dislike
Flammable Material	Like Where it is Headed(No Substantive Change)
Waste Disposal	Generally Like(Needs Clarification or Improvement)
Removal of Equipment	Like Where it is Headed(No Substantive Change)
Maintenance of machinery	Generally Like(Needs Clarification or Improvement)
Flow Lines, Transfer Lines and Gathering Lines	Dislike
Temporary Water lines	Generally Like(Needs Clarification or Improvement)
Financial Assurance	Dislike

Larimer County Oil and Gas Proposed Regulations

Q5 Do you have detailed suggestions to add, remove or modify anything in Section 17.3. - Standards Required for all Oil and Gas Facilities?

Not only the applicant, but all successors or assignees must follow these same standards.

Air quality standards must be met starting at day 1 and continuing for the life of the site.

Not just the surface must be restored, but underground to an appropriate distance, perhaps 20 feet.

Even if cleanup is deferred the applicant is still responsible and must respond immediately to initiate cleanup.

Even if technically infeasible to fix, the leak must be stopped immediately.

Technically or operationally infeasible is an ill defined term and means different levels of competence to different operators. Depending upon where this term is used, subsequent action halting the detriment to health or the environment must be defined when the operator makes that claim.

All emissions during well unloading must be captured.

Construction noise must be contained if it exceeds noise levels for zoning in the adjacent properties.

Odor must be continually monitored. The goal is to respond and correct before a complaint can be registered.

The access must be monitored at least daily to ensure that no trackout exists on public roads, sidewalks or right of way. Any trackout must be swept up as soon as it is observed.

All operating equipment must be properly balanced so that ground transmission of noise from drilling and operations is minimized.

If Drilling, completion flowback and produced fluids are not recycled they must be transported to a hazardous waste facility approved for handling that waste.

Proper documentation needs to be used to show that no waste is lost enroute.

Ground water monitoring wells should be encouraged. Any operational water wells located within 1000 feet of the operation must be sampled, beginning one week before start of activity, on a weekly basis to ensure that no change in water quality is observed.

It is the responsibility of all on site employees to maintain the trash and debris free site.

Maintenance involving any fluid (oil, ATF, brake, hydraulic, ...) must be performed over an impervious surface. Any fluid spills from maintenance must be cleaned immediately. Appropriate cleanup material must be available on site if maintenance or fueling is performed.

Applicant must maintain environmental insurance in perpetuity for failure to follow all standards when operating or closing down operations.

Q6 Do you have detailed suggestions to add, remove or modify anything in Section 17.4. - Guidelines for Oil and Gas Facilities?

Drilling fluids should reference the same list of prohibited chemicals noted in Section 17.3 for fracturing fluid.

Q7 Do you have detailed suggestions to add, remove or modify anything in Section 17.5. - Application Requirements?

A trackout plan should also be required.

Q8 Do you have detailed suggestions to add, remove or modify anything in Section 17.6. - Appeals?

Respondent skipped this question

Q9 Do you have detailed suggestions to add, remove or modify anything in Section 17.7. - Enforcement and Inspections?

Property inspection is allowed 24 hours per day on any day.

Following a spill, air quality or water quality violation the property must pass inspection before being allowed to restart operation.

Q10 Do you have detailed suggestions to add, remove or modify anything in Section 17.8. - Fees and Security for Reclamation?

Respondent skipped this question

Q11 Do you have detailed suggestions to add, remove or modify anything in Section 17.9. - Termination of Use or Modification?

Respondent skipped this question

Q12 Do you have detailed suggestions to add, remove or modify anything in Section 17.10. - Definitions?

Respondent skipped this question

Q13 Do you have any other suggestions for topics to add?

Respondent skipped this question

Q14 Please provide us with your contact information (optional) if you would like us to keep you informed about upcoming drafts, events and hearings?

Name

Marc Brown

Email Address

marcbrown@comcast.net

#2

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Thursday, November 14, 2019 9:05:09 PM
Last Modified: Thursday, November 14, 2019 9:44:03 PM
Time Spent: 00:38:53
IP Address: 71.205.251.231

Page 1

Q1 Are you associated with a group or organization that will be providing comments to this questionnaire?

No,
 If so what is the name of the Organization?:
 Ms.

Q2 Do you have detailed suggestions to add, remove or modify anything in Section 17. 1. - Intent and Purpose?

no

Q3 Do you have detailed suggestions to add, remove or modify anything in Section 17.2. - Required Process and Permits?

no

Q4 Please share your opinion on 17.3. - Standards Required for all Oil and Gas Facilities.

General	Generally Like(Needs Clarification or Improvement)
Air Quality	Dislike
Leak Detection and Repair	Dislike
Spills and Releases	Like Where it is Headed(No Substantive Change)
Well Liquids Unloading	Like Where it is Headed(No Substantive Change)
Noise	Like Where it is Headed(No Substantive Change)
Odors	Dislike
Dust	Dislike
Access	Like Where it is Headed(No Substantive Change)
Chemical Handling	Like Where it is Headed(No Substantive Change)
Recycle, Reuse and Disposal of Fluids	Dislike
Water Bodies	Dislike
Visual	Like Where it is Headed(No Substantive Change)
Well Plugging and Abandonment	Like Where it is Headed(No Substantive Change)
Flammable Material	Like Where it is Headed(No Substantive Change)
Waste Disposal	Like Where it is Headed(No Substantive Change)
Removal of Equipment	Like Where it is Headed(No Substantive Change)
Maintenance of machinery	Like Where it is Headed(No Substantive Change)
Flow Lines, Transfer Lines and Gathering Lines	Like Where it is Headed(No Substantive Change)
Temporary Water lines	Dislike
Financial Assurance	Dislike

Q5 Do you have detailed suggestions to add, remove or modify anything in Section 17.3. - Standards Required for all Oil and Gas Facilities?

Many sections are too vague using language such as ..."unless ...economically infeasible or impractical"(B.3, 4, and 5); "unless technically or operationally infeasible" (C.3); "Best management practices" (E and H.1) "to the extent reasonably possible" (G.2),"unless technically infeasible"(K.1, T.1) ; "We encourage.." (G.4) Language should be specific allowing for no interpretation or room for debate. If it is not feasible, the facility should not be operating. What exactly are "best management practices"? "strongly encouraged...should be changed to require definite practices not open to interpretation.

Q6 Do you have detailed suggestions to add, remove or modify anything in Section 17.4. - Guidelines for Oil and Gas Facilities?

Guidelines for O and G development applications are "strongly encouraged to incorporate..." These best practices should be spelled out and required. phrases such as "...unless technically infeasible" should not be part of these regulations. If it isn't technically feasible, the facility should not exist.

Larimer County Oil and Gas Proposed Regulations

Q7 Do you have detailed suggestions to add, remove or modify anything in Section 17.5. - Application Requirements?

The phrase "when relevant" should be part of these regulations. This allows too much interpretation.

Q8 Do you have detailed suggestions to add, remove or modify anything in Section 17.6. - Appeals?

no

Q9 Do you have detailed suggestions to add, remove or modify anything in Section 17.7. - Enforcement and Inspections?

no

Q10 Do you have detailed suggestions to add, remove or modify anything in Section 17.8. - Fees and Security for Reclamation?

no

Q11 Do you have detailed suggestions to add, remove or modify anything in Section 17.9. - Termination of Use or Modification?

no

Q12 Do you have detailed suggestions to add, remove or modify anything in Section 17.10. - Definitions?

no

Q13 Do you have any other suggestions for topics to add?

COGG setbacks are not adequate. I would like to see setback distances of 2000 feet from any "outside activity areas" or any buildings. This is a minimum safety setback.

Q14 Please provide us with your contact information (optional) if you would like us to keep you informed about upcoming drafts, events and hearings?

Name

Marion Cox

Email Address

cox.mari@gmail.com

#3

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Sunday, November 17, 2019 9:03:09 PM
Last Modified: Sunday, November 17, 2019 9:27:56 PM
Time Spent: 00:24:47
IP Address: 76.76.91.66

Page 1

Q1 Are you associated with a group or organization that will be providing comments to this questionnaire? **No**

Q2 Do you have detailed suggestions to add, remove or modify anything in Section 17. 1. - Intent and Purpose?

no

Q3 Do you have detailed suggestions to add, remove or modify anything in Section 17.2. - Required Process and Permits?

yes, B. ii. add and present and future welfare of people, animals and the environment.

Q4 Please share your opinion on 17.3. - Standards Required for all Oil and Gas Facilities.

General	Like Where it is Headed(No Substantive Change)
Air Quality	Dislike
Leak Detection and Repair	Dislike
Spills and Releases	No Comment
Well Liquids Unloading	No Comment
Noise	Dislike
Odors	Dislike
Dust	Dislike
Access	No Comment
Chemical Handling	Dislike
Recycle, Reuse and Disposal of Fluids	Dislike
Water Bodies	Generally Like(Needs Clarification or Improvement)
Visual	Generally Like(Needs Clarification or Improvement)
Well Plugging and Abandonment	Dislike
Flammable Material	No Comment
Waste Disposal	No Comment
Removal of Equipment	Dislike
Maintenance of machinery	No Comment
Flow Lines, Transfer Lines and Gathering Lines	No Comment
Temporary Water lines	No Comment
Financial Assurance	No Comment

Q5 Do you have detailed suggestions to add, remove or modify anything in Section 17.3. - Standards Required for all Oil and Gas Facilities?

- B.4. control by flare is hazardous to air quality and lights up the night sky
- G. 3. Odor complaints are serious, but the response system is too vague
- Where is the policy about concerns of ground vibrations, water disturbances and quakes?
- J. 2.If drilling is continued on an infrequent basis there should be a completion date set. How will the land be reclaimed? Specifically, plants and contours.
- N.1. Disclosure of abandoned well sites and flow lines needs to be public knowledge. How will people be informed in the future?

Q6 Do you have detailed suggestions to add, remove or modify anything in Section 17.4. - Guidelines for Oil and Gas Facilities?

no

Larimer County Oil and Gas Proposed Regulations

Q7 Do you have detailed suggestions to add, remove or modify anything in Section 17.5. - Application Requirements?

no

Q8 Do you have detailed suggestions to add, remove or modify anything in Section 17.6. - Appeals?

no

Q9 Do you have detailed suggestions to add, remove or modify anything in Section 17.7. - Enforcement and Inspections?

no

Q10 Do you have detailed suggestions to add, remove or modify anything in Section 17.8. - Fees and Security for Reclamation?

no

Q11 Do you have detailed suggestions to add, remove or modify anything in Section 17.9. - Termination of Use or Modification?

no

Q12 Do you have detailed suggestions to add, remove or modify anything in Section 17.10. - Definitions?

no

Q13 Do you have any other suggestions for topics to add?

What exactly is the method of notifying the public about new wells, leaks, mitigation, hazards, etc. ?

Q14 Please provide us with your contact information (optional) if you would like us to keep you informed about upcoming drafts, events and hearings?

Name

Teresa Jones

Email Address

teresajones@usa.net

#4

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Monday, November 18, 2019 12:20:23 PM
Last Modified: Monday, November 18, 2019 12:39:53 PM
Time Spent: 00:19:29
IP Address: 129.82.253.186

Page 1

Q1 Are you associated with a group or organization that will be providing comments to this questionnaire? **No**

Q2 Do you have detailed suggestions to add, remove or modify anything in Section 17. 1. - Intent and Purpose? **Respondent skipped this question**

Q3 Do you have detailed suggestions to add, remove or modify anything in Section 17.2. - Required Process and Permits? **Respondent skipped this question**

Q4 Please share your opinion on 17.3. - Standards Required for all Oil and Gas Facilities.

General	Dislike
Air Quality	Dislike
Leak Detection and Repair	Dislike
Spills and Releases	Dislike
Well Liquids Unloading	Dislike
Noise	Dislike
Odors	No Comment
Dust	No Comment
Access	No Comment
Chemical Handling	Dislike

Q5 Do you have detailed suggestions to add, remove or modify anything in Section 17.3. - Standards Required for all Oil and Gas Facilities?

17.3 A2-Oil and gas facilities need to be located to minimize impacts on residential neighborhoods and schools.
 17.3 General comment on all sections--get rid of the language about "unless it is economically infeasible or impractical". Economics don't rule over health, environment and public safety.
 17.3C Leak detection and repair needs to be more than semi annual--continuous monitoring should be required.
 17.3D Why would remediation of spills/releases be deferred to COGCC?
 17.3E How are emissions monitored during well liquid unloading?
 17.3F Permissible noise level should take into account surrounding land use, especially if that is residential.
 17.3J What is the process to verify chemical composition?

Q6 Do you have detailed suggestions to add, remove or modify anything in Section 17.4. - Guidelines for Oil and Gas Facilities? **Respondent skipped this question**

Q7 Do you have detailed suggestions to add, remove or modify anything in Section 17.5. - Application Requirements? **Respondent skipped this question**

Q8 Do you have detailed suggestions to add, remove or modify anything in Section 17.6. - Appeals? **Respondent skipped this question**

Q9 Do you have detailed suggestions to add, remove or modify anything in Section 17.7. - Enforcement and Inspections? **Respondent skipped this question**

Larimer County Oil and Gas Proposed Regulations

Q10 Do you have detailed suggestions to add, remove or modify anything in Section 17.8. - Fees and Security for Reclamation?

Respondent skipped this question

Q11 Do you have detailed suggestions to add, remove or modify anything in Section 17.9. - Termination of Use or Modification?

Respondent skipped this question

Q12 Do you have detailed suggestions to add, remove or modify anything in Section 17.10. - Definitions?

Respondent skipped this question

Q13 Do you have any other suggestions for topics to add?

Have you looked at the Adams county regulations for guidance. I believe they are quite good.

Q14 Please provide us with your contact information (optional) if you would like us to keep you informed about upcoming drafts, events and hearings?

Name

Shelly Carroll

Email Address

shellycarroll@msn.com

#5

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Monday, November 18, 2019 7:27:02 PM
Last Modified: Monday, November 18, 2019 7:31:05 PM
Time Spent: 00:04:03
IP Address: 66.109.209.160

Page 1

Q1 Are you associated with a group or organization that will be providing comments to this questionnaire? **No**

Q2 Do you have detailed suggestions to add, remove or modify anything in Section 17. 1. - Intent and Purpose?

It seems to me that Larimer County should encourage reuse of water to save fresh water sources. In this regard, Larimer County should encourage use of produced water as a fracking fluid. The way I read the proposed regs it looks like only fresh water can be used as a fracking fluid.

Q3 Do you have detailed suggestions to add, remove or modify anything in Section 17.2. - Required Process and Permits?

no

Q4 Please share your opinion on 17.3. - Standards Required for all Oil and Gas Facilities.

General	Generally Like(Needs Clarification or Improvement)
Air Quality	Generally Like(Needs Clarification or Improvement)
Leak Detection and Repair	Generally Like(Needs Clarification or Improvement)
Spills and Releases	Generally Like(Needs Clarification or Improvement)
Well Liquids Unloading	Generally Like(Needs Clarification or Improvement)
Noise	Generally Like(Needs Clarification or Improvement)
Odors	Generally Like(Needs Clarification or Improvement)
Dust	Generally Like(Needs Clarification or Improvement)
Access	Generally Like(Needs Clarification or Improvement)
Chemical Handling	Generally Like(Needs Clarification or Improvement)
Recycle, Reuse and Disposal of Fluids	Dislike
Water Bodies	Dislike
Visual	Dislike

Q5 Do you have detailed suggestions to add, remove or modify anything in Section 17.3. - Standards Required for all Oil and Gas Facilities? **Respondent skipped this question**

Q6 Do you have detailed suggestions to add, remove or modify anything in Section 17.4. - Guidelines for Oil and Gas Facilities? **Respondent skipped this question**

Q7 Do you have detailed suggestions to add, remove or modify anything in Section 17.5. - Application Requirements? **Respondent skipped this question**

Q8 Do you have detailed suggestions to add, remove or modify anything in Section 17.6. - Appeals? **Respondent skipped this question**

Q9 Do you have detailed suggestions to add, remove or modify anything in Section 17.7. - Enforcement and Inspections? **Respondent skipped this question**

Q10 Do you have detailed suggestions to add, remove or modify anything in Section 17.8. - Fees and Security for Reclamation? **Respondent skipped this question**

Larimer County Oil and Gas Proposed Regulations

Q11 Do you have detailed suggestions to add, remove or modify anything in Section 17.9. - Termination of Use or Modification?

Respondent skipped this question

Q12 Do you have detailed suggestions to add, remove or modify anything in Section 17.10. - Definitions?

Respondent skipped this question

Q13 Do you have any other suggestions for topics to add?

Respondent skipped this question

Q14 Please provide us with your contact information (optional) if you would like us to keep you informed about upcoming drafts, events and hearings?

Name

Tommy Raye

Email Address

tommy@watersupplyllc.com

#6

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Tuesday, November 26, 2019 11:25:05 AM
Last Modified: Tuesday, November 26, 2019 12:29:06 PM
Time Spent: 01:04:01
IP Address: 165.127.8.254

Page 1

Q1 Are you associated with a group or organization that will be providing comments to this questionnaire?

Yes,
If so what is the name of the Organization?:
Colorado Department of Public Health and Environment

Q2 Do you have detailed suggestions to add, remove or modify anything in Section 17. 1. - Intent and Purpose?

Does the County just intend to establish regulations for drilling and production, or would the County also like to regulate hydraulic fracturing and flowback? If so, consider adding those terms to Section 17.1.

Q3 Do you have detailed suggestions to add, remove or modify anything in Section 17.2. - Required Process and Permits?

Respondent skipped this question

Q4 Please share your opinion on 17.3. - Standards Required for all Oil and Gas Facilities.

Respondent skipped this question

Q5 Do you have detailed suggestions to add, remove or modify anything in Section 17.3. - Standards Required for all Oil and Gas Facilities?

Consider revising Section 17.3.A.2 to read "Oil and Gas facilities should be located to minimize impacts on public health, safety, welfare the environment and agricultural operations."

Consider revising Section 17.3.A.2 to fully spell out and abbreviate Colorado Department of Public Health and Environment (CDPHE) Air Pollution Control Division (APCD). Also, the word "for" should be added to the following excerpt "and the rules and regulations promulgated by the AQCC [for] all applicable emission sources."

Consider revising Section 17.3.A.4 to read "98% destruction [or] removal efficiency." Manufacturer data is typically based on "destruction efficiency". It's best to be consistent with Air Quality Control Commission regulations and require operators to have the device meet 98% destruction or removal efficiency.

17.3.E- What do you mean by "at least 90% emissions when utilizing combustion to control venting shall be employed at all facilities"? Do you mean 90% emissions reduction, 90% destruction or removal efficiency? Why 90% and not 98%?

17.3.G- consider abbreviating CDPHE and AQCC because those terms should have already been spelled out fully in previous provisions.

Consider revising 17.3.H.4 to read "Unless otherwise approved by the County Health and Engineering Department, only water will be used for dust suppression activities within 300 feet of the ordinary high-water mark of any body of water."

17.3.M.4.- 4. It appears "be installed" or some similar phrase is missing from this section "Fencing shall [be installed] for all the phases of an Oil and Gas facility development to ensure the security and visual aesthetics of the use."

Q6 Do you have detailed suggestions to add, remove or modify anything in Section 17.4. - Guidelines for Oil and Gas Facilities?

Consider revising 17.4.2.d. to read "Wipe down drill pipes as they exit the wellbore". "Each time drilling operation 'trips' out of hole" is worded somewhat confusingly.

Consider revising 17.4.2.d. to read "manufacturer's recommended specifications" because "specifications" is more encompassing than "levels"

Larimer County Oil and Gas Proposed Regulations

Q7 Do you have detailed suggestions to add, remove or modify anything in Section 17.5. - Application Requirements?

Respondent skipped this question

Q8 Do you have detailed suggestions to add, remove or modify anything in Section 17.6. - Appeals?

Respondent skipped this question

Q9 Do you have detailed suggestions to add, remove or modify anything in Section 17.7. - Enforcement and Inspections?

Respondent skipped this question

Q10 Do you have detailed suggestions to add, remove or modify anything in Section 17.8. - Fees and Security for Reclamation?

Respondent skipped this question

Q11 Do you have detailed suggestions to add, remove or modify anything in Section 17.9. - Termination of Use or Modification?

Respondent skipped this question

Q12 Do you have detailed suggestions to add, remove or modify anything in Section 17.10. - Definitions?

Respondent skipped this question

Q13 Do you have any other suggestions for topics to add?

Respondent skipped this question

Q14 Please provide us with your contact information (optional) if you would like us to keep you informed about upcoming drafts, events and hearings?

Name

Sean Hackett

Email Address

sean.hackett@state.co.us

#7

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Friday, November 29, 2019 6:40:00 AM
Last Modified: Friday, November 29, 2019 6:54:55 AM
Time Spent: 00:14:55
IP Address: 108.18.193.125

Page 1

Q1 Are you associated with a group or organization that will be providing comments to this questionnaire? **No**

Q2 Do you have detailed suggestions to add, remove or modify anything in Section 17. 1. - Intent and Purpose?

Yes, in Section A, the language "and reasonable" should be removed. The intent is health & safety first, regardless of the qualifier word "reasonable". Further "to the extent practical" should also be removed. This is also a qualifier and vague phrase that does not belong based on prioritizing health & safety as being the required outcome.

Q3 Do you have detailed suggestions to add, remove or modify anything in Section 17.2. - Required Process and Permits?

Yes, "Reasonable and necessary mitigation steps have been taken" is again "light" language that reduces the goal of producing public health. This should state "REQUIRED mitigation steps have been taken..."

Q4 Please share your opinion on 17.3. - Standards Required for all Oil and Gas Facilities.

General	No Comment
Air Quality	Dislike
Leak Detection and Repair	Dislike
Spills and Releases	Dislike
Well Liquids Unloading	Dislike
Noise	Dislike
Odors	Dislike
Dust	Dislike
Access	Dislike
Chemical Handling	Dislike
Recycle, Reuse and Disposal of Fluids	Dislike
Water Bodies	Dislike
Visual	Dislike
Well Plugging and Abandonment	Dislike
Flammable Material	Dislike
Waste Disposal	Dislike
Removal of Equipment	Dislike
Maintenance of machinery	Dislike
Flow Lines, Transfer Lines and Gathering Lines	Dislike
Temporary Water lines	Dislike
Financial Assurance	Dislike

Q5 Do you have detailed suggestions to add, remove or modify anything in Section 17.3. - Standards Required for all Oil and Gas Facilities?

All sub-sections that contain language such as "unless the application demonstrates that it is economically infeasible or impractical to utilize such a system.", "unless it is demonstrated by the application materials the utilization of such equipment is not economically feasible or practical.", "unless technically or operationally infeasible.", "unless technically infeasible." should be revised. Again, SB181 makes it clear that health & safety should be prioritized first. It is not appropriate, nor in line with this objective, to provide such easy "outs" as it is possible to say anything is economically practical. This in its current state is not acceptable. Spills should be reported immediately instead of waiting 24 hours.

Larimer County Oil and Gas Proposed Regulations

Q6 Do you have detailed suggestions to add, remove or modify anything in Section 17.4. - Guidelines for Oil and Gas Facilities?

Again, there should be no such language as "unless it is technically infeasible." Anything could be framed as "technically infeasible". The requirement is human health & safety, environment first.

Q7 Do you have detailed suggestions to add, remove or modify anything in Section 17.5. - Application Requirements?

The reclamation plan should include a bond amount to ensure the land within the county is in fact restored regardless of the state of the opportunity at the time that this is required.

Q8 Do you have detailed suggestions to add, remove or modify anything in Section 17.6. - Appeals?

Respondent skipped this question

Q9 Do you have detailed suggestions to add, remove or modify anything in Section 17.7. - Enforcement and Inspections?

Respondent skipped this question

Q10 Do you have detailed suggestions to add, remove or modify anything in Section 17.8. - Fees and Security for Reclamation?

Respondent skipped this question

Q11 Do you have detailed suggestions to add, remove or modify anything in Section 17.9. - Termination of Use or Modification?

Respondent skipped this question

Q12 Do you have detailed suggestions to add, remove or modify anything in Section 17.10. - Definitions?

Respondent skipped this question

Q13 Do you have any other suggestions for topics to add?

Respondent skipped this question

Q14 Please provide us with your contact information (optional) if you would like us to keep you informed about upcoming drafts, events and hearings?

Name

Kevin Krause

Email Address

kevkrause@gmail.com

#8

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Friday, November 29, 2019 2:19:41 PM
Last Modified: Friday, November 29, 2019 4:43:39 PM
Time Spent: 02:23:57
IP Address: 72.19.141.120

Page 1

Q1 Are you associated with a group or organization that will be providing comments to this questionnaire?

No,
If so what is the name of the Organization?:
I am submitting these comments independently.

Q2 Do you have detailed suggestions to add, remove or modify anything in Section 17. 1. - Intent and Purpose?

- A. Delete: "To the extent practicable" - not necessary and weaken the language
 - B.4. Add: "and wildlife habitat"
 - B.5. Delete: "as appropriate" - not necessary, as the rest of the phrase makes appropriateness obvious
 - B.6. Rewrite or delete - is vague and unenforceable
-

Q3 Do you have detailed suggestions to add, remove or modify anything in Section 17.2. - Required Process and Permits?

Why does this section not follow the same format as previous section? (17.1. A. then 1.; whereas 17.2 A. then a.)

Please put oil and gas activities in a dedicated Special Review section!

It makes a lot more sense to create a dedicated Special Review section for oil and gas activities, and would make compliance and enforcement more straightforward than the suggested referencing to other Code sections.

But, if this proposed language is kept then please INCLUDE:

- * more public participation opportunities
- * do not leave decision responsibility only to the planning director
- * clarify the actual title of the referenced planning director

And

B.a.ii. Rephrase/clarify: "Reasonable and necessary mitigation" - if the County does not clearly define this statement it will be unenforceable, and potentially the subject of legal challenge

Larimer County Oil and Gas Proposed Regulations

Q4 Please share your opinion on 17.3. - Standards Required for all Oil and Gas Facilities.

General	Generally Like(Needs Clarification or Improvement)
Air Quality	Generally Like(Needs Clarification or Improvement)
Leak Detection and Repair	Generally Like(Needs Clarification or Improvement)
Spills and Releases	Generally Like(Needs Clarification or Improvement)
Noise	Generally Like(Needs Clarification or Improvement)
Odors	Generally Like(Needs Clarification or Improvement)
Dust	Generally Like(Needs Clarification or Improvement)
Access	Generally Like(Needs Clarification or Improvement)
Chemical Handling	Generally Like(Needs Clarification or Improvement)
Recycle, Reuse and Disposal of Fluids	Generally Like(Needs Clarification or Improvement)
Water Bodies	Generally Like(Needs Clarification or Improvement)
Visual	Generally Like(Needs Clarification or Improvement)
Well Plugging and Abandonment	Generally Like(Needs Clarification or Improvement)
Flammable Material	Generally Like(Needs Clarification or Improvement)
Waste Disposal	Generally Like(Needs Clarification or Improvement)
Removal of Equipment	Generally Like(Needs Clarification or Improvement)
Maintenance of machinery	Generally Like(Needs Clarification or Improvement)
Flow Lines, Transfer Lines and Gathering Lines	Generally Like(Needs Clarification or Improvement)
Temporary Water lines	Generally Like(Needs Clarification or Improvement)
Financial Assurance	Generally Like(Needs Clarification or Improvement)

Q5 Do you have detailed suggestions to add, remove or modify anything in Section 17.3. - Standards Required for all Oil and Gas Facilities?

Larimer County Oil and Gas Proposed Regulations

A.1. Add "all" before applicable federal . . .

B.1. Change "The use?" to: "All facilities and operations"

B.1. Add "emissions" before "emission sources" - because they could be different

B.1. Add, at the end, and State and County health departments.

B.3. Delete: from "unless" to the end of the sentence - too vague and County has such authority under other sections

B.4. Delete: "or"

B.4. Delete from "unless" to end of sentence - vague and unenforceable. And, how would the County make sure determination other than the unsupported word of the operator?

B.4. Regarding flaring: The oil and gas industry has admitted that flaring is NOT necessary, except in limited emergency situations. Larimer County needs to clearly and definitively state that flaring is prohibited except in limited emergency situations AND define specifically what those emergency situations are.

B.5. Delete from "unless" to end of sentence - vague and unenforceable. This is another instance of allowing the industry to define its own standards - and I don't think that's what the residents of Larimer County have in mind

B.7. Change "should" to "shall" - "Should" is a nonenforceable term

B.7.d. Add clarification of when "delay" shall occur (as opposed to "suspension" by adding: "if suspension would create unsafe conditions," and define difference between "suspend" and "delay"

B.7.e. Change "or" or "and"

B.7.f. Delete "will" and change "would" to "could"

C.1. Change or delete: "modern leak detection technologies and equipment" - vague and unenforceable, as well as being industry defined

C.2. & 3. Regarding "verified": Who verifies? How? Self-reporting is not adequate.

E.1. Regarding "best management practices": As defined by whom? Currently this term is generally defined by the API in industry-friendly terms, and in many cases does not serve or benefit the health and safety of the general public or the environment. I do not believe the residents of Larimer County are eager to have the industry continue to define what keeps the rest of use safe!

F.1. Should the included weekend day be further defined as a day with operations are occurring in order for such analyses to accurately reflect the noise levels?

G.4. Delete "We encourage" and change to "The operator SHALL communicate . . ."

H.1. See above regarding "best management practices."

H.3. Add that SDS shall be made available to the public, in a timely manner (please define what is timely), along with requiring written justification why the use of such is necessary, practical, and without less toxic alternative

I.1.c. Why is the County requiring the use of Magnesium Chloride when there are more environmentally-friendly methods of treatment?

I. Add new subsection 2. to cover operations occurring with in road GID/taxing district and requiring a. notice to all households within the GID and b. permitting the GID to request that Magnesium Chloride not be used

J. Add new subsection 4. reserving to the County the right to add to the list in subsection 3. at any time as the County deems necessary to protect the health, safety, and welfare of the citizens and environment

K.1. How shall the fluids be "recycled"?

K.1. & 3. "unless technically infeasible" is vague, unenforceable and allows interpretation to be industry-driven, rather than by the County

L.2. Delete "that are typically" - language without this qualifier does what the intent is AND allows the County to request unusual tests that could be critical

M.3. After "off-site" add "and upwards"

M.5. Change from "6 months" to "3 months, seasonal weather permitting"

N.1.d. Change "any" to "all" and "gathering or flow lines" to "gathering, flowlines, and pipelines"

Q.2. Sentence is repetitive

R.2. Add "contained" before "impervious" and define "storm events"

S.1. Change "of" to "or" and include "wildlife habitat in the list

S.2. This statement is confusing

S.3. "shall be provided" by whom? to whom? by when?

U.1. Change from "must demonstrate the financial capability" to "must provide proof of bonding, naming the County as the beneficiary sufficient to reclaim . . ." and define "disturbed areas" - what constitutes a disturbed area, does such include the length of drill lines and pipelines?

Larimer County Oil and Gas Proposed Regulations

Q6 Do you have detailed suggestions to add, remove or modify anything in Section 17.4. - Guidelines for Oil and Gas Facilities?

A. This entire section encourages non-compliance by all the uses of encouragement; needs to firmly and definitively set forth the powers and authority that SB-181 has permitted local government, i.e., the County, instead of being so darn flaky!

A. Change "strongly encouraged to" to "shall" and delete "Where reasonably necessary"

A.1. Change "are encouraged" to "may be required to"

A.1.f. Elimination of flaring MUST be a REQUIREMENT in ALL cases, except in specifically defined emergencies

A.2. Change "are encouraged" to "may be required"

A.2.g. Define "'green frac' methods"

A.3. Change "are encouraged" to "may be required" and delete "unless technically infeasible"

Q7 Do you have detailed suggestions to add, remove or modify anything in Section 17.5. - Application Requirements?

Why does this list omit most of the plans recommended in section 5 of the September 25, 2019 handouts to the task force?

A. Regulations needs to set forth standards as to when these are relevant or language that gives the County specific authority to determine when they are relevant

A. Does this list of submittals include plans that protect the environment and environmental resources, e.g., protection of natural lands and wildlife habitat?

Q8 Do you have detailed suggestions to add, remove or modify anything in Section 17.6. - Appeals?

Did not have the opportunity to review Code section 22, but request that appeals to oil and gas applications include more public input than typical appeals.

Q9 Do you have detailed suggestions to add, remove or modify anything in Section 17.7. - Enforcement and Inspections?

A. Change "may" in second sentence to "shall"

Q10 Do you have detailed suggestions to add, remove or modify anything in Section 17.8. - Fees and Security for Reclamation?

Standards in this section must include bonding (held by or naming the County as the sole beneficiary) sufficient to cover potential costs related to the ENTIRE operation - not just the pad - and ALL RISKS to the soil, air, water, and wildlife impacted or related thereto

Q11 Do you have detailed suggestions to add, remove or modify anything in Section 17.9. - Termination of Use or Modification?

Respondent skipped this question

Q12 Do you have detailed suggestions to add, remove or modify anything in Section 17.10. - Definitions?

Respondent skipped this question

Larimer County Oil and Gas Proposed Regulations

Q13 Do you have any other suggestions for topics to add?

1. Applicants should be required to cover all costs, including of 1) the County review process, 2) all reports/consultations required by the County, and 3) security or bonding sufficient to cover all potential reclamation / remediation / abandonment costs from well pad to end of drilling lines and all associated pipelines from soil, air, water, wildlife, and human disruption
2. Should be an oil and gas-specific Special Review process, and that O&G SR should include:
 - (1) Applicant requirement to engage with community prior to initiating SR requirements with the County
 - (2) Surface agreements shall not be finalized until the applicant has completed SR
 - (3) Applicants should be required to report all instances of non-compliance within the previous 10 years (and pending complaints) to staff during pre-application conference and to make such available to the public during the initial community engagement
 - (4) Pre-application conference shall be required prior to initiation of application and SR process - to review expectations of applicant and mitigate any possibility of mis-communication; should also include County/applicant discussion of location, impacts, etc., and how such might be mitigated as part of application/SR
 - (5) public engagement of prior notification of at least w weeks of all adjacent landowners and residents and businesses within one-half mile
 - (a) after pre-application conference and prior to application and
 - (b) during SR process in timely manner to allow County and applicant to make community-friendly amendments to application
3. Current SR process does not cover oil and gas specific issues that must be addressed to meet the standards and take full advantage of the powers granted local governments by SB-181. Examples include:
 - (1) alternative sites
 - (2) surface and groundwater protection / quality
 - (3) open / natural lands, including:
 - a. habitat and migration corridors
 - b. natural and historical landmarks
 - c. rare plants
 - d. floodplains and riparian corridors
 - e. wetlands
 - (4) agricultural lands
 - (5) impact on surrounding land uses
 - (6) pipeline mapping, and public disclosure of such
 - (7) 24-hours emergency contact information of at least 2 individuals with 24/7 decision-making authority
 - (8) proof of utility agreements
 - (9) traffic plan/assessment
 - (10) cost to GID road district residents
 - (11) setback requirements
 - (12) time frame requirements for
 - a. process
 - b. inactive well, before reclamation is required

In conclusion,

Thank you for the opportunity to express my concerns.

Q14 Please provide us with your contact information (optional) if you would like us to keep you informed about upcoming drafts, events and hearings?

Name	Sherri Valentine
Email Address	sher@skybeam.com

#9

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Saturday, November 30, 2019 2:47:55 PM
Last Modified: Saturday, November 30, 2019 3:36:35 PM
Time Spent: 00:48:40
IP Address: 129.19.6.125

Page 1

Q1 Are you associated with a group or organization that will be providing comments to this questionnaire?

Yes,
If so what is the name of the Organization?:
Platte River Power Authority, Fort Collins, Colorado

Q2 Do you have detailed suggestions to add, remove or modify anything in Section 17. 1. - Intent and Purpose?

In general, Platte River Power Authority ("Platte River") recommends that Larimer County include protections intended to minimize the impacts of oil and gas development on sensitive and critical facilities within the County. These would include additional protections for critical infrastructure and facilities that provide essential public services to Larimer County residents, such as power plants and electrical utility infrastructure. At Section 17.3(2), the proposed Oil and Gas Regulations ("Regulations") note the intent is to minimize impacts on agricultural operations. This wording is too narrow. It should include minimizing impacts on critical facilities and infrastructure and residential areas and incorporate the new mandate of the Colorado Oil and Gas Conservation Commission ("COGCC") to protect and minimize adverse impacts to public health, safety and welfare, the environment, and wildlife resources. Further, Platte River believes the tone of the current Regulations is more advisory than regulatory. In many instances, the draft Regulations establish a requirement, but include language that the requirement may be avoided if compliance is "economically infeasible or impracticable." In other instances, the Regulations state "we encourage the Operator" to do something. We urge Larimer County to adopt requirements that provide clarity, both for oil and gas operators and the community, as to the exact standards required under the proposed Regulations. If applications for oil and gas facilities are processed through special review, open-ended language exposes the special review process to further attack.

Q3 Do you have detailed suggestions to add, remove or modify anything in Section 17.2. - Required Process and Permits?

Respondent skipped this question

Q4 Please share your opinion on 17.3. - Standards Required for all Oil and Gas Facilities.

Table with 2 columns: Category (General, Air Quality, Leak Detection and Repair, Spills and Releases, Chemical Handling, Water Bodies, Flammable Material, Flow Lines, Transfer Lines and Gathering Lines, Financial Assurance) and Response (Generally Like(Needs Clarification or Improvement))

Larimer County Oil and Gas Proposed Regulations

Q5 Do you have detailed suggestions to add, remove or modify anything in Section 17.3. - Standards Required for all Oil and Gas Facilities?

Section 17.3(B) deals with air quality. Subsection 4 provides that all emissions shall be routed to and controlled by a flare or combustor operated with at least 98% destruction removal efficiency. Instead of referencing "all emissions" to be controlled, there should be a specific reference to "hydrocarbons." Subsection 7 requires site operations to be modified on air quality action days posted by the Colorado Department of Public Health and Environment. Once these notices are posted they are effective until 4 p.m. the following day. Given the short timeframe to respond to a notice, operators potentially should be required to subscribe to air quality alerts via email. Additionally, the Regulations should define a process or require proper documentation to verify that operators responded to the air quality alerts. The Regulations should also clarify if the requirement to respond to air quality alerts applies countywide or only in the portion of the County located in the Denver Metro/North Front Range ozone nonattainment area.

Section 17.3(D) deals with spills and releases. Platte River believes that any application for an oil and gas facility should include a written plan for spill prevention, control, and countermeasures that would comply with local, state, and federal regulatory requirements.

Regulation 17.3(J)(2) requires that drilling and completion chemicals be removed within 60 days. Platte River encourages Larimer County to require these chemicals be removed within 30 days of drilling completion.

At Section 17.3(L)(1), we propose the language be changed to include the following: "The applicant shall provide documentation to the County, as required by the COGCC, demonstrating how the COGCC water quality protection standards are being complied with, including both surface and groundwater protections."

Section 17.3(S)(3) requires that operators provide the coordinates of all flow lines, gathering lines, and transfer lines, but does not specify when the operator must supply these coordinates. At Section 17.3(N)(1)(d), it states an operator must only supply these coordinates with the notice of completion of well abandonment for any decommissioned wells. We believe these coordinates should be provided within 30 days of completion of any flow lines, transfer lines, or gathering lines. Moreover, given the extreme hazards associated with flow lines, we encourage Larimer County to proactively regulate flow lines and advocate against waiting to see what standards the COGCC will adopt.

Q6 Do you have detailed suggestions to add, remove or modify anything in Section 17.4. - Guidelines for Oil and Gas Facilities?

Respondent skipped this question

Q7 Do you have detailed suggestions to add, remove or modify anything in Section 17.5. - Application Requirements?

Platte River further encourages Larimer County to adopt a requirement that operators negotiate and obtain surface use agreements for any proposed facilities, and that all applications for oil and gas facilities must include a surface use agreement. At a minimum, Larimer County should mandate that operators obtain a surface use agreement if they intend to locate oil and gas operations near sensitive or critical facilities, including but not limited to power generation or energy utility infrastructure. Given the nature of energy delivery and the threat to public health and safety if it were disrupted, we believe requiring a surface use agreement for lands owned by or used for energy generation and delivery is essential to protect community welfare.

Q8 Do you have detailed suggestions to add, remove or modify anything in Section 17.6. - Appeals?

Respondent skipped this question

Q9 Do you have detailed suggestions to add, remove or modify anything in Section 17.7. - Enforcement and Inspections?

Respondent skipped this question

Q10 Do you have detailed suggestions to add, remove or modify anything in Section 17.8. - Fees and Security for Reclamation?

Respondent skipped this question

Q11 Do you have detailed suggestions to add, remove or modify anything in Section 17.9. - Termination of Use or Modification?

Respondent skipped this question

Q12 Do you have detailed suggestions to add, remove or modify anything in Section 17.10. - Definitions?

Respondent skipped this question

Q13 Do you have any other suggestions for topics to add?

Platte River recommends that Larimer County adopt specific setback requirements and advocates against waiting to see what standards the COGCC adopts. At a minimum, we believe the 1,000-foot setback requirement for schools should be adopted for all occupied structures. The COGCC Director's Objective Criteria for the rule-making process subjects any proposed oil and gas well locations within 2,000 feet of an occupied structure to additional analysis. Platte River urges Larimer County to adopt a setback requirement in line with the 2,000 feet used in the Director's Objective Criteria. Additionally, Platte River recommends a setback requirement of 2,500 feet from sensitive and critical facilities, including electric generation facilities and substations.

Larimer County Oil and Gas Proposed Regulations

Q14 Please provide us with your contact information (optional) if you would like us to keep you informed about upcoming drafts, events and hearings?

Name

Caroline Schmiedt, Deputy General Counsel

Email Address

schmiedtc@prpa.org

#10

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Saturday, November 30, 2019 4:50:54 PM
Last Modified: Saturday, November 30, 2019 4:58:49 PM
Time Spent: 00:07:55
IP Address: 24.9.136.3

Page 1

Q1 Are you associated with a group or organization that will be providing comments to this questionnaire?	No
Q2 Do you have detailed suggestions to add, remove or modify anything in Section 17. 1. - Intent and Purpose?	Respondent skipped this question
Q3 Do you have detailed suggestions to add, remove or modify anything in Section 17.2. - Required Process and Permits?	Respondent skipped this question
Q4 Please share your opinion on 17.3. - Standards Required for all Oil and Gas Facilities.	
General	Like Where it is Headed(No Substantive Change)
Air Quality	Like Where it is Headed(No Substantive Change)
Leak Detection and Repair	Like Where it is Headed(No Substantive Change)
Spills and Releases	Like Where it is Headed(No Substantive Change)
Well Liquids Unloading	Like Where it is Headed(No Substantive Change)
Chemical Handling	Like Where it is Headed(No Substantive Change)
Recycle, Reuse and Disposal of Fluids	Like Where it is Headed(No Substantive Change)
Water Bodies	Like Where it is Headed(No Substantive Change)
Waste Disposal	Like Where it is Headed(No Substantive Change)
Q5 Do you have detailed suggestions to add, remove or modify anything in Section 17.3. - Standards Required for all Oil and Gas Facilities?	Respondent skipped this question
Q6 Do you have detailed suggestions to add, remove or modify anything in Section 17.4. - Guidelines for Oil and Gas Facilities?	Respondent skipped this question
Q7 Do you have detailed suggestions to add, remove or modify anything in Section 17.5. - Application Requirements?	Respondent skipped this question
Q8 Do you have detailed suggestions to add, remove or modify anything in Section 17.6. - Appeals?	Respondent skipped this question
Q9 Do you have detailed suggestions to add, remove or modify anything in Section 17.7. - Enforcement and Inspections?	Respondent skipped this question
Q10 Do you have detailed suggestions to add, remove or modify anything in Section 17.8. - Fees and Security for Reclamation?	Respondent skipped this question
Q11 Do you have detailed suggestions to add, remove or modify anything in Section 17.9. - Termination of Use or Modification?	Respondent skipped this question
Q12 Do you have detailed suggestions to add, remove or modify anything in Section 17.10. - Definitions?	Respondent skipped this question

Larimer County Oil and Gas Proposed Regulations

Q13 Do you have any other suggestions for topics to add?

I am concerned with air quality and water conservation in Larimer County and Colorado, therefore I strongly support fair and equitable regulation of the oil and gas industry.

Q14 Please provide us with your contact information (optional) if you would like us to keep you informed about upcoming drafts, events and hearings?

Name

Kevin Woodward

Email Address

kwoodward@yahoo.com

#11

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Saturday, November 30, 2019 5:31:43 PM
Last Modified: Saturday, November 30, 2019 5:40:29 PM
Time Spent: 00:08:45
IP Address: 67.174.104.39

Page 1

Q1 Are you associated with a group or organization that will be providing comments to this questionnaire?

Yes,
If so what is the name of the Organization?:
Larimer Alliance for Health, Safety & the Environment

Q2 Do you have detailed suggestions to add, remove or modify anything in Section 17. 1. - Intent and Purpose?

We strongly recommend the limitation of all uses of phrases that allow loopholes with regard to protection of public health, safety, and the environment. SB19-181 eliminated "economic feasibility" considerations from the state's oil and gas regulatory decisions, the COGCC Mission Change White Paper dated Nov. 1, 2019 affirmed this decision, and we encourage Larimer County to take a similar approach and eliminate loophole language such as "to the maximum extent practicable" and "where feasible."

Q3 Do you have detailed suggestions to add, remove or modify anything in Section 17.2. - Required Process and Permits?

We find that the minimalist "Special Review and Minor Special Review requirements, as well as the "Supplemental Review" criteria referenced in 17.2.B neglect to include public notice or process regarding new oil and gas proposals and are void of an array of materials required by a number of other Colorado county governments that would allow the County to fully review and vet an oil and gas site proposal.

We recommend, at minimum:

- The development of a separate land use process and special use review process that is specific to new and existing oil and gas development and infrastructure.
-- The development of a public process for each new oil and gas facility that includes a 60 days-notice of the permit application to all residents, landowners, and parents of school children attending a school within 1 mile of a proposed oil and gas site, public disclosure of all required documents submitted to the County by the Operator, and an independent environmental, financial, and risk analysis to be prepared and presented to the County, and public hearings before the County Planning Commission and Larimer County Commissioners.
-- A detailed process for the submission of required materials by the operator to the county. We finally that a detailed list of required application materials, (as described in Section 17.5) be moved to Section 17.2.C. Furthermore, this section should clearly define the required planning documentation. This documentation should further ensure that the operator has a sense of the County's standards regarding protections of public health, safety, the environment and wildlife resources.

Q4 Please share your opinion on 17.3. - Standards Required for all Oil and Gas Facilities. Respondent skipped this question

Larimer County Oil and Gas Proposed Regulations

Q5 Do you have detailed suggestions to add, remove or modify anything in Section 17.3. - Standards Required for all Oil and Gas Facilities?

-- We strongly recommend that the opening paragraph 17.3.A.2 include a required 2,000 foot setback from all residential or high occupancy buildings, outdoor parks, water bodies or other environmentally sensitive areas.

Southern Larimer County falls within Colorado's 8-hour ozone non-attainment area for Air Quality. Oil and gas development is one of the top contributors to greenhouse gas emissions. We believe that Larimer County residents deserve innovative local regulatory measures that require compliance without "feasibility and practicability" loopholes. The County should be clear about what it requires to protect the health and safety of its citizens and the environment.

-- We believe that the county should require certification of compliance with COGCC, CDHPE, AQCC and EPA air quality emission standards, as well as compliance with all OSHA work practice requirements regarding benzene exposure.

We recommend that the county conduct onsite baseline air quality monitoring ahead of all oil and gas permitting considerations, and should require annual Leak Detection and Repair inspections. The results of these inspections and annual onsite air quality monitoring should be reported to the County.

-- Operators should be required to incorporate best management practices with regard to maintenance activities, "tankless" production techniques, the use of telemetric control and monitoring systems, and control of hydrocarbon and VOC emissions.

-- Given that leaks and spills at oil and gas sites pose a threat to public health, safety and the environment, the County should exercise its right to require that any oil and gas well with an identified leak shall be shut down and not allowed to operate until the operator has provided evidence that the leak has been repaired if an immediate timeline for repair is not identified by the operator. We recommend specific requirements and timelines for reporting leaks and spills, and believe the county should make information regarding leaks and spills be available to the public

-- Detailed noise mitigation is an imperative component in the development of oil and gas regulations that are truly intended to protect public health, safety, welfare, the environment, and wildlife resources. We recommend that baseline daytime and nighttime noise levels be measured in Residential, Agricultural or Rural and Commercially zoned areas and no equipment operated in a manner so as to create noise which causes noise levels to exceed ambient noise by 3-10 decibels, depending on time of day and location.

-- We further recommend that the County create a complaint hotline for the purposes of health and nuisance complaints, including noise, odors, or other non-compliance concerns. Exposure to odors from oil and gas development can often be an initial sign of chemical exposure with acute impacts to public health. We find that the County regulations regarding odor, allow for potential unmitigated exposure and risk public health. We recommend that the County create a public comment portal that will also link with the COGCC.

-- Water bodies are extremely susceptible to impacts from oil and gas operations. Impacts to a variety of water bodies pose serious risk to public health, safety, welfare, and the environment. We recommend in Section 17.3.L a requirement that operators provide a water quality plan to that includes details such as the operator's plans for water quality testing, prevention of illicit or inadvertent discharges, stormwater discharge management, containment of pollutants, and spill notification and response as well as plans concerning downhole construction details and installation practices, including casing and cementing design to protect surface water and aquifers from contamination.

-- In addition to complying with the COGCC's plugging and abandonment requirements (section 17.3.N), we request the inclusion of soil and water assessments and air quality monitoring within 90 days of completion and at least once a year afterwards, and a permanent physical marking at the site of each abandoned well.

-- Flowlines, transfer lines, and gathering lines represent a significant amount of infrastructure mixed in communities and environmental resources. We strongly recommend setbacks and reverse setbacks commensurate with blowout and blast radiuses for new and existing pipelines using the existing scientific formula established by industry, a current and comprehensive mapping system, regular inspections and pressure tests. We also recommend that all pipelines be buried under at least four feet of cover soil and require the use of tracer wire to enable onsite detection.

Q6 Do you have detailed suggestions to add, remove or modify anything in Section 17.4. - Guidelines for Oil and Gas Facilities?

Protection of public health, safety, welfare and the environment, as required by SB19-181, means that local governments should be clear about their standard of operating and performance regarding oil and gas development. We strongly recommend that the language in Section 17.4 and elsewhere be direct and explicit, avoiding ambiguity or subjectivity. Therefore we ask that the County "require" (not "encourage") tankless production techniques as applicable, use zero emission dehydrators, use pressure suitable separator and vapor recovery units, use no-bleed continuous and intermittent pneumatic devices; the use of electric rigs and Tier 4 engines; use automated tank gauging, and prohibit flaring except during emergencies or upset conditions.

We also recommend that Section 17.4A.2 be moved to Section 17.3.G and language to "encourage" compliance be strengthened.

Q7 Do you have detailed suggestions to add, remove or modify anything in Section 17.5. - Application Requirements?

Please see the detailed recommendations provided to County Staff from the League of Oil Impacted Coloradans (LOGIC) and the Larimer Alliance.

Q8 Do you have detailed suggestions to add, remove or modify anything in Section 17.6. - Appeals?

Please see the detailed recommendations provided to County Staff from the League of Oil Impacted Coloradans (LOGIC) and the Larimer Alliance.

Q9 Do you have detailed suggestions to add, remove or modify anything in Section 17.7. - Enforcement and Inspections?

Please see the detailed recommendations provided to County Staff from the League of Oil Impacted Coloradans (LOGIC) and the Larimer Alliance.

Larimer County Oil and Gas Proposed Regulations

Q10 Do you have detailed suggestions to add, remove or modify anything in Section 17.8. - Fees and Security for Reclamation?

Please see the detailed recommendations provided to County Staff from the League of Oil Impacted Coloradans (LOGIC) and the Larimer Alliance.

Q11 Do you have detailed suggestions to add, remove or modify anything in Section 17.9. - Termination of Use or Modification?

Please see the detailed recommendations provided to County Staff from the League of Oil Impacted Coloradans (LOGIC) and the Larimer Alliance.

Q12 Do you have detailed suggestions to add, remove or modify anything in Section 17.10. - Definitions?

Please see the detailed recommendations provided to County Staff from the League of Oil Impacted Coloradans (LOGIC) and the Larimer Alliance.

Q13 Do you have any other suggestions for topics to add?

Please see the detailed recommendations provided to County Staff from the League of Oil Impacted Coloradans (LOGIC) and the Larimer Alliance.

Q14 Please provide us with your contact information (optional) if you would like us to keep you informed about upcoming drafts, events and hearings?

Name

Tom Rhodes

Email Address

tomrhodes2010@gmail.com

#12

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Saturday, November 30, 2019 7:49:39 PM
Last Modified: Saturday, November 30, 2019 7:53:46 PM
Time Spent: 00:04:07
IP Address: 75.71.65.71

Page 1

Q1 Are you associated with a group or organization that will be providing comments to this questionnaire? **No**

Q2 Do you have detailed suggestions to add, remove or modify anything in Section 17. 1. - Intent and Purpose? **Respondent skipped this question**

Q3 Do you have detailed suggestions to add, remove or modify anything in Section 17.2. - Required Process and Permits? **Respondent skipped this question**

Q4 Please share your opinion on 17.3. - Standards Required for all Oil and Gas Facilities.

General	Dislike
Air Quality	Dislike
Leak Detection and Repair	Dislike
Spills and Releases	Dislike
Well Liquids Unloading	Dislike
Noise	Dislike
Odors	Dislike
Dust	Dislike
Access	No Comment
Chemical Handling	Dislike
Recycle, Reuse and Disposal of Fluids	Dislike
Water Bodies	Dislike
Visual	Dislike
Well Plugging and Abandonment	Dislike
Flammable Material	Dislike
Removal of Equipment	No Comment
Maintenance of machinery	No Comment
Flow Lines, Transfer Lines and Gathering Lines	Dislike
Temporary Water lines	Dislike
Financial Assurance	No Comment

Q5 Do you have detailed suggestions to add, remove or modify anything in Section 17.3. - Standards Required for all Oil and Gas Facilities? **Respondent skipped this question**

Q6 Do you have detailed suggestions to add, remove or modify anything in Section 17.4. - Guidelines for Oil and Gas Facilities? **Respondent skipped this question**

Q7 Do you have detailed suggestions to add, remove or modify anything in Section 17.5. - Application Requirements? **Respondent skipped this question**

Q8 Do you have detailed suggestions to add, remove or modify anything in Section 17.6. - Appeals? **Respondent skipped this question**

Q9 Do you have detailed suggestions to add, remove or modify anything in Section 17.7. - Enforcement and Inspections? **Respondent skipped this question**

Larimer County Oil and Gas Proposed Regulations

Q10 Do you have detailed suggestions to add, remove or modify anything in Section 17.8. - Fees and Security for Reclamation?

Respondent skipped this question

Q11 Do you have detailed suggestions to add, remove or modify anything in Section 17.9. - Termination of Use or Modification?

Respondent skipped this question

Q12 Do you have detailed suggestions to add, remove or modify anything in Section 17.10. - Definitions?

Respondent skipped this question

Q13 Do you have any other suggestions for topics to add?

The minimum setback needs to be 2500ft and greater for vulnerable populations. Also, the cities whose roads are being used by the rigs in the county need to receive a percentage of a tax to maintain those roads.

Q14 Please provide us with your contact information (optional) if you would like us to keep you informed about upcoming drafts, events and hearings?

Respondent skipped this question

#13

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Saturday, November 30, 2019 9:58:17 PM
Last Modified: Saturday, November 30, 2019 11:20:01 PM
Time Spent: 01:21:43
IP Address: 76.25.159.173

Page 1

Q1 Are you associated with a group or organization that will be providing comments to this questionnaire? **No**

Q2 Do you have detailed suggestions to add, remove or modify anything in Section 17. 1. - Intent and Purpose?

I wish to see the County addressing and regulating all stages, including exploration and seismic testing

Q3 Do you have detailed suggestions to add, remove or modify anything in Section 17.2. - Required Process and Permits?

Are public meetings and notification part of the process? I think the public and businesses within minimum 2,000 feet should be made aware and able to attend informational and decision making meetings

Q4 Please share your opinion on 17.3. - Standards Required for all Oil and Gas Facilities.

General	Dislike
Air Quality	Dislike
Leak Detection and Repair	Dislike
Spills and Releases	Generally Like(Needs Clarification or Improvement)
Well Liquids Unloading	Generally Like(Needs Clarification or Improvement)
Noise	Generally Like(Needs Clarification or Improvement)
Odors	Dislike
Dust	Like Where it is Headed(No Substantive Change)
Access	Generally Like(Needs Clarification or Improvement)
Chemical Handling	Generally Like(Needs Clarification or Improvement)
Recycle, Reuse and Disposal of Fluids	Dislike
Water Bodies	Dislike
Visual	Like Where it is Headed(No Substantive Change)
Well Plugging and Abandonment	Generally Like(Needs Clarification or Improvement)
Flammable Material	Like Where it is Headed(No Substantive Change)
Waste Disposal	Like Where it is Headed(No Substantive Change)
Removal of Equipment	Like Where it is Headed(No Substantive Change)
Maintenance of machinery	Like Where it is Headed(No Substantive Change)
Flow Lines, Transfer Lines and Gathering Lines	Dislike
Temporary Water lines	Generally Like(Needs Clarification or Improvement)
Financial Assurance	Dislike

Q5 Do you have detailed suggestions to add, remove or modify anything in Section 17.3. - Standards Required for all Oil and Gas Facilities?

Protecting our air and water need to be top priority, over profits for O&G. This means requiring the items that say "economically infeasible or impractical." Many other local governments have done it. Please follow their example. Also, close the 90 day loophole for emissions. Our air quality is poor. We must make serious efforts to turn it around and not add to it. The regulations appear to be flexible for the operators benefit. Leak detection should be done by a 3rd party, not the operator self reporting. Under odors, I'm shocked suggestion of keeping windows closed 24/7 or relocating is considered okay. Who's paying for me to temporarily relocate if the odors are bad enough? Is that fee going to be written into the regulations? Please require mapping of flow lines, etc. Please include setbacks from homes, parks, schools and water sources and setbacks from existing oil wells for new development.

Q6 Do you have detailed suggestions to add, remove or modify anything in Section 17.4. - Guidelines for Oil and Gas Facilities?

Please require these items, not just encourage. These are things that will protect our air and environment

Larimer County Oil and Gas Proposed Regulations

Q7 Do you have detailed suggestions to add, remove or modify anything in Section 17.5. - Application Requirements? **Respondent skipped this question**

Q8 Do you have detailed suggestions to add, remove or modify anything in Section 17.6. - Appeals? **Respondent skipped this question**

Q9 Do you have detailed suggestions to add, remove or modify anything in Section 17.7. - Enforcement and Inspections?

I like letter B but would like to see some specifics. The County should hire an inspector for this job

Q10 Do you have detailed suggestions to add, remove or modify anything in Section 17.8. - Fees and Security for Reclamation?

please make sure the total cost for the life of the well is covered in bonding. Also, is the transportation fee set should adequately cover costs to repair damage to roads from all the truck traffic

Q11 Do you have detailed suggestions to add, remove or modify anything in Section 17.9. - Termination of Use or Modification? **Respondent skipped this question**

Q12 Do you have detailed suggestions to add, remove or modify anything in Section 17.10. - Definitions? **Respondent skipped this question**

Q13 Do you have any other suggestions for topics to add? **Respondent skipped this question**

Q14 Please provide us with your contact information (optional) if you would like us to keep you informed about upcoming drafts, events and hearings? **Respondent skipped this question**

#14

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Sunday, December 01, 2019 7:42:37 PM
Last Modified: Sunday, December 01, 2019 7:44:44 PM
Time Spent: 00:02:07
IP Address: 73.168.211.179

Page 1

Q1 Are you associated with a group or organization that will be providing comments to this questionnaire? **Yes,**
 If so what is the name of the Organization?:
 King Operating Corp. and Wellington Operating Co.

Q2 Do you have detailed suggestions to add, remove or modify anything in Section 17. 1. - Intent and Purpose? **Respondent skipped this question**

Q3 Do you have detailed suggestions to add, remove or modify anything in Section 17.2. - Required Process and Permits? **Respondent skipped this question**

Q4 Please share your opinion on 17.3. - Standards Required for all Oil and Gas Facilities. **Respondent skipped this question**

Q5 Do you have detailed suggestions to add, remove or modify anything in Section 17.3. - Standards Required for all Oil and Gas Facilities? **Respondent skipped this question**

Q6 Do you have detailed suggestions to add, remove or modify anything in Section 17.4. - Guidelines for Oil and Gas Facilities? **Respondent skipped this question**

Q7 Do you have detailed suggestions to add, remove or modify anything in Section 17.5. - Application Requirements? **Respondent skipped this question**

Q8 Do you have detailed suggestions to add, remove or modify anything in Section 17.6. - Appeals? **Respondent skipped this question**

Q9 Do you have detailed suggestions to add, remove or modify anything in Section 17.7. - Enforcement and Inspections? **Respondent skipped this question**

Q10 Do you have detailed suggestions to add, remove or modify anything in Section 17.8. - Fees and Security for Reclamation? **Respondent skipped this question**

Q11 Do you have detailed suggestions to add, remove or modify anything in Section 17.9. - Termination of Use or Modification? **Respondent skipped this question**

Q12 Do you have detailed suggestions to add, remove or modify anything in Section 17.10. - Definitions? **Respondent skipped this question**

Q13 Do you have any other suggestions for topics to add?

King Operating Corporation and Wellington Operating Company are submitting a joint comment letter by email to Matt Lafferty.

Larimer County Oil and Gas Proposed Regulations

Q14 Please provide us with your contact information (optional) if you would like us to keep you informed about upcoming drafts, events and hearings?

Name

Tom Shaw

Email Address

thshaw@msn.com
