
Fwd: [COGCC] Form02 #401475450 is approved

1 message

Tami Yellico <tyellico@broomfield.org>
To: Eileen Albrecht <ealbrecht@broomfield.org>

Sun, Jun 10, 2018 at 8:03 AM

----- Forwarded message -----

From: <Helpdesk.Eform@gov.state.co.us>

Date: Sunday, June 10, 2018

Subject: [COGCC] Form02 #401475450 is approved

To: TYellico@broomfield.org

Cc: epottorff@broomfield.org, lvillareal@broomfield.org, abertanzetti@broomfield.org, gmcginn@broomfield.org,

jvahling@broomfield.org, ldavis@broomfield.org



Colorado

**Oil & Gas Conservation
Commission**

Department of Natural Resources

1120 Lincoln St. Suite 801
Denver, CO 80203

Phone: (303) 894-2100

FAX: (303) 894-2109

cogcc.state.co.us

Form 2 Notice of Issuance

The Form 2 Application for Permit-to-Drill for LIVINGSTON S19-25-2C has been issued. Attached is a copy of the approved Form 2 [COA].

--
Tami Yellico
Director of Strategic Initiatives
City & County of Broomfield
(303) 464-5153

2 attachments

 **401475450_approved.pdf**

241K



401475450_PublicComment.pdf

15K

APPLICATION FOR PERMIT TO:

Drill Deepen Re-enter Recomplete and Operate

TYPE OF WELL OIL <input checked="" type="checkbox"/> GAS <input type="checkbox"/> COALBED <input type="checkbox"/> OTHER _____	Refiling <input type="checkbox"/>
ZONE TYPE SINGLE ZONE <input checked="" type="checkbox"/> MULTIPLE ZONES <input type="checkbox"/> COMMINGLE ZONES <input type="checkbox"/>	Sidetrack <input type="checkbox"/>

Date Received: 01/16/2018

Well Name: Livingston Well Number: S19-25-2C

Name of Operator: EXTRACTION OIL & GAS INC COGCC Operator Number: 10459

Address: 370 17TH STREET SUITE 5300

City: DENVER State: CO Zip: 80202

Contact Name: Alyssa Andrews Phone: (720)481-2379 Fax: ()

Email: aandrews@extractionog.com

RECLAMATION FINANCIAL ASSURANCE
Plugging and Abandonment Bond Surety ID: 20130028

WELL LOCATION INFORMATION

QtrQtr: NWSE Sec: 7 Twp: 1S Rng: 68W Meridian: 6

Latitude: 39.978564 Longitude: -105.040058

Footage at Surface: <u>2332</u> Feet	FNL/FSL	FEL/FWL
<u>FSL</u> <u>1510</u> Feet	<u>FSL</u>	<u>FEL</u>

Field Name: WATTENBERG Field Number: 90750

Ground Elevation: 5316 County: BROOMFIELD

GPS Data:
Date of Measurement: 11/10/2017 PDOP Reading: 1.3 Instrument Operator's Name: T. WINNICKI

If well is Directional Horizontal (highly deviated) **submit deviated drilling plan.**

Footage at Top of Prod Zone: <u>2473</u> Feet	FNL/FSL	FEL/FWL	Bottom Hole: <u>460</u> Feet	FNL/FSL	FEL/FWL
<u>FSL</u> <u>673</u> Feet	<u>FSL</u>	<u>FWL</u>	<u>FSL</u> <u>640</u> Feet	<u>FSL</u>	<u>FWL</u>
Sec: <u>7</u> Twp: <u>1S</u> Rng: <u>68W</u>			Sec: <u>19</u> Twp: <u>1S</u> Rng: <u>68W</u>		

LOCATION SURFACE & MINERALS & RIGHT TO CONSTRUCT

Surface Ownership: Fee State Federal Indian

The Surface Owner is: is the mineral owner beneath the location.
(check all that apply) is committed to an Oil and Gas Lease.
 has signed the Oil and Gas Lease.
 is the applicant.

The Mineral Owner beneath this Oil and Gas Location is: Fee State Federal Indian

The Minerals beneath this Oil and Gas Location will be developed by this Well: Yes

The right to construct the Oil and Gas Location is granted by: Surface Use Agreement

Surface damage assurance if no agreement is in place: _____ Surface Surety ID: _____

LEASE INFORMATION

Using standard QtrQtr, Sec, Twp, Rng format, describe one entire mineral lease that will be produced by this well (Describe lease beneath surface location if produced. Attach separate description page or map if necessary.)

Section 7-1S-68W: S/2

Total Acres in Described Lease: 320 Described Mineral Lease is: Fee State Federal Indian

Federal or State Lease # _____

Distance from Completed Portion of Wellbore to Nearest Lease Line of described lease: 0 Feet

CULTURAL DISTANCE INFORMATION

Distance to nearest:

Building: 829 Feet

Building Unit: 1313 Feet

High Occupancy Building Unit: 5280 Feet

Designated Outside Activity Area: 5280 Feet

Public Road: 694 Feet

Above Ground Utility: 1241 Feet

Railroad: 5280 Feet

Property Line: 282 Feet

INSTRUCTIONS:

- All measurements shall be provided from center of the Proposed Well to nearest of each cultural feature as described in Rule 303.a.(5).

- Enter 5280 for distance greater than 1 mile.

- Building - nearest building of any type. If nearest Building is a Building Unit, enter same distance for both.

- Building Unit, High Occupancy Building Unit, and Designated Outside Activity Area - as defined in 100-Series Rules.

DESIGNATED SETBACK LOCATION INFORMATION

Check all that apply. This location is within a: Buffer Zone
 Exception Zone
 Urban Mitigation Area

- Buffer Zone – as described in Rule 604.a.(2), within 1,000' of a Building Unit

- Exception Zone - as described in Rule 604.a.(1), within 500' of a Building Unit.

- Urban Mitigation Area - as defined in 100-Series Rules.

Pre-application Notifications (required if location is within 1,000 feet of a building unit):

Date of Rule 305.a.(1) Urban Mitigation Area Notification to Local Government: _____

Date of Rule 305.a.(2) Buffer Zone Notification to Building Unit Owners: _____

SPACING and UNIT INFORMATION

Distance from completed portion of proposed wellbore to nearest completed portion of offset wellbore permitted or completed in the same formation: 396 Feet

Distance from Completed Portion of Wellbore to Nearest Unit Boundary 150 Feet (Enter 5280 for distance greater than 1 mile.)

Federal or State Unit Name (if appl): _____ Unit Number: _____

SPACING & FORMATIONS COMMENTS

Spacing Order Numbers: 407-2256 & 407-2274

Unit Configuration:

Section 7-1S-68W: S/2

Section 18-1S-68W: ALL

Section 19-1S-68W: ALL

OBJECTIVE FORMATIONS

Objective Formation(s)	Formation Code	Spacing Order Number(s)	Unit Acreage Assigned to Well	Unit Configuration (N/2, SE/4, etc.)
CODELL	CODL	407-2274	1600	7: S/2, 18 & 19: ALL

DRILLING PROGRAM

Proposed Total Measured Depth: 21830 Feet

Distance from the proposed wellbore to nearest existing or proposed wellbore belonging to another operator, including plugged wells:

Enter distance if less than or equal to 1,500 feet: 43 Feet No well belonging to another operator within 1,500 feet

Will a closed-loop drilling system be used? Yes

Is H₂S gas reasonably expected to be encountered during drilling operations at concentrations greater than or equal to 100 ppm? No (If Yes, attach an H₂S Drilling Operations Plan)

Will salt sections be encountered during drilling? No

Will salt based (>15,000 ppm Cl) drilling fluids be used? No

Will oil based drilling fluids be used? Yes

BOP Equipment Type: Annular Preventor Double Ram Rotating Head None

GROUNDWATER BASELINE SAMPLING AND MONITORING AND WATER WELL SAMPLING

Water well sampling required per Rule 318A

DRILLING WASTE MANAGEMENT PROGRAM

Drilling Fluids Disposal: OFFSITE Drilling Fluids Disposal Methods: Commercial Disposal

Cuttings Disposal: OFFSITE Cuttings Disposal Method: Commercial Disposal

Other Disposal Description:

Beneficial reuse or land application plan submitted? _____

Reuse Facility ID: _____ or Document Number: _____

CASING PROGRAM

Casing Type	Size of Hole	Size of Casing	Wt/Ft	Csg/Liner Top	Setting Depth	Sacks Cmt	Cmt Btm	Cmt Top
CONDUCTOR	24	16	42	0	80	100	80	0
SURF	12+1/4	9+5/8	36	0	1500	400	1500	0
1ST	8+1/2	5+1/2	20	0	21830	2962	21830	1500

Conductor Casing is NOT planned

DESIGNATED SETBACK LOCATION EXCEPTIONS

Check all that apply:

- Rule 604.a.(1)A. Exception Zone (within 500' of Building Unit)
- Rule 604.b.(1)A. Exception Location (existing or approved Oil & Gas Location now within a Designated Setback as a result of Rule 604.a.)
- Rule 604.b.(1)B. Exception Location (existing or approved Oil & Gas Location is within a Designated Setback due to Building Unit construction after Location approval)
- Rule 604.b.(2) Exception Location (SUA or site-specific development plan executed on or before August 1, 2013)
- Rule 604.b.(3) Exception Location (Building Units constructed after August 1, 2013 within setback per an SUA or site-specific development plan)

GREATER WATTENBERG AREA LOCATION EXCEPTIONS

Check all that apply:

- Rule 318A.a. Exception Location (GWA Windows).
- Rule 318A.c. Exception Location (GWA Twinning).

RULE 502.b VARIANCE REQUEST

Rule 502.b. Variance Request from COGCC Rule or Spacing Order Number _____

OTHER LOCATION EXCEPTIONS

Check all that apply:

Rule 318.c. Exception Location from Rule or Spacing Order Number _____

Rule 603.a.(2) Exception Location (Property Line Setback).

ALL exceptions and variances require attached Request Letter(s). Refer to applicable rule for additional required attachments (e.g. waivers, certifications, SUAs).

OPERATOR COMMENTS AND SUBMITTAL

Comments Anti-Collision report used to determine distances. Please find the report attached as "Other".
Distance from completed portion to nearest completed portion of wellbore permitted/completed in the same formation:
396' (Ref. well: Livingston S19-25-3N)
Distance to nearest wellbore belonging to another operator: 43' (Ref. well: Tihen Ma 18-13, Status PA, NOBLE ENERGY PRODUCTION INC)

All BMPs on the related Form 2A for the Livingston pad are applicable to this well.

Exception Location Requested for Rules 318A.a. & 318A.c. The SUA waives all Exception Locations. Please see the attached SUA including Section 13 and the relevant highlighted portions on page 8.

This application is in a Comprehensive Drilling Plan _____ CDP #: _____

Location ID: _____

Is this application being submitted with an Oil and Gas Location Assessment application? Yes

I hereby certify all statements made in this form are, to the best of my knowledge, true, correct, and complete.

Signed: _____ Print Name: Alyssa Andrews

Title: Regulatory Analyst Date: 1/16/2018 Email: aandrews@extractionog.com

Operator must have a valid water right or permit allowing for industrial use or purchased water from a seller that has a valid water right or permit allowing for industrial use, otherwise an application for a change in type of use is required under Colorado law. Operator must also use the water in the location set forth in the water right decree or well permit, otherwise an application for a change in place of use is required under Colorado law. Section 37-92-103(5), C.R.S. (2011).

Based on the information provided herein, this Application for Permit-to-Drill complies with COGCC Rules and applicable orders and is hereby approved.

COGCC Approved:  Director of COGCC Date: 6/1/2018

Expiration Date: 05/31/2020

API NUMBER
05 014 20753 00

Conditions Of Approval

All representations, stipulations and conditions of approval stated in the Form 2A for this location shall constitute representations, stipulations and conditions of approval for this Form 2 Permit-to-Drill and are enforceable to the same extent as all other representations, stipulations and conditions of approval stated in this Permit-to-Drill.

COA Type

Description

	<p>1) Submit Form 42 electronically to COGCC 48 hours prior to MIRU for the first well activity with a rig on the pad and provide 48 hour spud notice via Form 42 for all subsequent wells drilled on the pad.</p> <p>2) Comply with Rule 317.j. and provide cement coverage from TD to a minimum of 200' above Niobrara. Verify coverage with cement bond log.</p> <p>Bradenhead tests shall be performed and reported according to the following schedule and Form 17 submitted within 10 days of each test:</p> <p>1) Within 60 days of rig release, prior to stimulation. If any pressure greater than 200 psi, must contact COGCC engineer prior to stimulation.</p> <p>2) 6 months after rig release, prior to stimulation (delayed completions).</p> <p>3) Within 30 days of first production, as reported on Form 5A.</p>
--	---

Best Management Practices

No BMP/COA Type

Description

1	Drilling/Completion Operations	317.p One of the first wells drilled on the pad will be logged with open-hole Resistivity Log and Gamma Ray Log from the kick-off point into the surface casing. All wells on the pad will have a cement bond log with gamma-ray run on production casing (or on intermediate casing if production liner is run) into the surface casing. The horizontal portion of every well will be logged with a measured-while-drilling gamma-ray log. The Form 5, Completion Report, for each well on the pad will list all logs run and have those logs attached. The Form 5 for a well without open-hole logs shall clearly state "No open-hole logs were run" and shall clearly identify (by API#, well name & number) the well in which open-hole logs were run.
2	Drilling/Completion Operations	Operator acknowledges and will comply with COGCC policy for Bradenhead Monitoring during Hydraulic Fracturing treatments in the Greater Wattenberg Area dated May 29, 2012.
3	Drilling/Completion Operations	Anti-collision: Operator will perform an anti-collision evaluation of all active (producing, shut in, or temporarily abandoned) offset wellbores that have the potential of being within 150 feet of a proposed well prior to drilling operations for the proposed well. Notice shall be given to all offset operators prior to drilling.

Total: 3 comment(s)

Applicable Policies and Notices to Operators

Notice Concerning Operating Requirements for Wildlife Protection.
http://cogcc.state.co.us/documents/reg/Policies/Wildlife_Notice.pdf

Attachment Check List

Att Doc Num

Name

401475450	FORM 2 SUBMITTED
401477893	WELL LOCATION PLAT
401482685	DIRECTIONAL DATA
401482686	DEVIATED DRILLING PLAN
401487943	OffsetWellEvaluations Data
401510445	OTHER
401514901	EXCEPTION LOC REQUEST
401514905	SURFACE AGRMT/SURETY

401660648

OFFSET WELL EVALUATION

Total Attach: 9 Files

General Comments

<u>User Group</u>	<u>Comment</u>	<u>Comment Date</u>
Permit	Final review complete.	06/01/2018
Engineer	Offset wells evaluated	04/27/2018
Permit	Status Active: with operator concurrence, changed spacing order number from 407-2256 to 407-2274. Permitting review complete.	04/26/2018
Permit	Status Pending - contacted Operator for corrections: - revise spacing order number from 407-2256 to 407-2274, as order 407-2256 allows only a single horizontal well in the unit, whereas order 407-2274 allows up to 20 horizontal wells in the unit.	04/25/2018
LGD	"Broomfield will be submitting comments with respect to the applicable Form 2A for this well, and incorporates those comments by this reference."	02/23/2018
Permit	Per Rule 305.d.(1)A. , the comment period has been extended from 20 days to 30 days at the request of the Broomfield County LGD; the comment period will end February 24, 2018.	01/26/2018
Permit	Passed Completeness.	01/25/2018

Total: 7 comment(s)

Public Comments

The following comments were provided by members of the public and were considered during the technical review of this application.

No.	Comment	Comment Date
1	Given the prodigious deficiencies, errors, oversights and gaps in Extraction's Drilling Plan submitted to the City and County of Broomfield, I object to any further permitting on the Livingston and Interchange Pads.	02/18/2018
2	Given the prodigious deficiencies, errors, oversights and gaps in Extraction's Drilling Plan submitted to the City and County of Broomfield, I object to any further permitting on the Livingston and Interchange Pads.	02/18/2018
3	Please slow Extraction down. Their drilling plan is poorly put together and inaccurate, e.g., citing that they can inject wastewater and deposit cuttings in Broomfield and using studies on air quality that lack scientific vigor. We don't trust them to follow through on promises made in their so-called cooperation with the city. We need your help in holding them to the highest standards in protecting our health and safety.	02/18/2018
4	COGCC must delay approval of the above permit because Broomfield County has not approved the Comprehensive drilling plan that was submitted for their review and approval. Extraction has an agreed MOU with Broomfield and their CDP is not meeting this agreement. For example, According to Item 9 (C) of the Agreement, Extraction has not provided a project schedule for the plugging and abandonment of the 39 existing wells in Exhibit C.	02/18/2018
5	The City of Broomfield has concluded that Extraction should be prohibited from submitting its Form 2 and 2A (drilling) permits to the State (COGCC), until Extraction submits to the City a complete Comprehensive Drilling Plan for all of the proposed wells in compliance with the Operator Agreement. The CDP submitted to the city is not approved by the city.	02/19/2018
6	<p>Over the Martin Luther King holiday weekend, I was one of the numerous Broomfield residents who reviewed thoroughly the 700-page "Comprehensive Drilling Plan" submitted by EXTRACTION Oil&Gas (XOG). We found the document to be non-compliant with the requirements as agreed to by XOG and the city of Broomfield. Furthermore, there are numerous unresolved issues that have been ignored by XOG. I know the city has its list of unresolved issues that will be forwarded to COGCC. I also know that other residents have given you the list of non-compliant details and unresolved issues.</p> <p>On this President's Day weekend, it will be appropriate for the COGCC to let the Oil & Gas Industry know that if it insists on drilling in highly populated residential areas, then the old way of doing things will not be accepted. With homes, schools and churches in close proximity, the cost is simply too high to be shoddy. If the Industry can't even take the time to submit proper documentation, it is also a harbinger of the kind of field work they will embark on. The COGCC cannot overlook this. It is time for the COGCC to take a tough stand.</p>	02/19/2018
7	<p>I. Request to disapprove Extraction Forms 2 and 2A</p> <p>Presently, there are unresolved issues, problems with the Extraction's plan to drill for oil and gas - detailed in their latest "Comprehensive Drilling Plan", dated January 26, 2018 within densely-populated neighborhoods in Broomfield, Colorado. This latest document does not address the concerns, questions, problems identified by Broomfield citizens, city/county staffs per the "Broomfield City and County Manager" letter, dated January 22, 2018 to Mr. Chandler Newhall of Extraction Oil and Gas.</p> <p>Additionally, there have been several serious accidents including that of the Windsor explosion in December 2017. We urge you, the COGCC to delay the approval of Extraction's Forms 2 and 2A for all well sites in Broomfield</p>	02/23/2018

until these issues are resolved.

II. High Isoprene levels measured by CDPHE

The report from the Colorado Department of Public Health and Environment (CDPHE), dated May 26, 2017 titled "Health Risk Evaluations of VOCs in Ambient Air was in response to Health Concerns at Triple Creek Oil and Gas Site". The report was done in response to numerous and continuous odor complaints of citizens living near the wells. The report measurements and the current setback requirements at both the State and local Broomfield levels are cause for concern and are inadequate to protect the health and safety of the citizens.

The Triple Creek Oil and Gas VOC data from the above report were measured at 4900 feet from the well site. The measured level of isoprene exceeds many times the ambient air. Isoprene is an isotropic gas and extremely flammable. It is suspected to cause generic defects and cancer. It does have long lasting negative effects.

The annual average of isoprene in ambient air along the Front Range is 0.1ppb.

The reported air concentration of isoprene at the Triple Creek Oil and Gas well site was 2.8ppb or equal to 28 times the annual average.

a. At 1320', the distance ratio is $(4900/1320) = 3.71$. The exposure (to humans) at 1320' is $= (3.71)(3.71) * 28 = 385.6$ times the annual average exposure.

2. At 500', the distance ratio is $(4900/500) = 9.8$. The exposure (to humans) at 500' is $= (9.8)(9.8) * 28 = 2,689.1$ times the annual average exposure.

III. Review of Extraction "Comprehensive Drilling Plan"

1.0 Summary:

The "Comprehensive Drilling Plan" for the Broomfield Project" (CDP) submitted to the City and County of Broomfield, dated January 26, 2018 is 942 pages long and is nearly identical to that of the December 15, 2017, 734 pages. It has the addition of the Forms 2 and 2A pages by Extraction Oil & Gas company.

2.0 Review comments of the original Dec 15, 2017 CDP.

a. Uneven detailed data reporting for different sections:

The Traffic reports are from page 151 to page 394 (243 pages) and contain many superfluous data spreadsheets. The report fails to recommend a traffic control light

or stop sign at the corner of 160th and Sheridan.

- b. The Noise reports have data sheets of the sound power meter used to measure ambient noise level but do not have explanations regarding the mathematical modeling of drilling engine noises (pp 96-98 of CDP).
- c. The important air monitoring section is from page 398 to 410 (only 12 pages).
- d. Incorrect or missing data: A number of data values in the Extraction CDP do not dovetail with requirements set out in the Broomfield Resolution 2017-186.
- e. Page 15 of the CDP asserts that "...Extraction's operations shall remain under the COGCC Rule 802 ... which is 55dBA from 7:00am to 7:00pm, and 50dBA from 7:00pm to 7:00am." Data shown by Extraction in section "Background Ambient Survey Mitigated Sound Impact Report", page 99 of the CDP exceed these limits.
- f. CDP refers to "EPA Natural Gas Star Program", page 400. Page 409 has a typo "... Start Program" instead of "... Star Program."
- g. CDP page 401, 2.1.3 Completions: "Extraction will provide safety data sheets for all chemicals that are brought on site..." It is necessary to require the disclosure the quantity of these chemicals brought in and out of the site on each date.
- h. CDP page 401, 2.1.3 Completions: "All gas encountered will be ... combusted with 98% destruction efficiency." CDP page 497 refers to >99%.
- i. CDP page 402, 2.1.4 Production: "Oil not meeting pipeline specifications, may be stored on site in pressure vessels..." How long will they be stored there?
- j. CDP page 403, 3.2 Air Pollution Emission Notices: "Extraction predicts fugitive emissions to be below permitting thresholds..." How will Extraction know that?
- k. CDP page 405, 4.4.2 LDAR Program: "In addition to the quarterly FLIR inspection ... leaks will be monitored using equipment automation..." What is the accuracy and responsiveness of the detection system? Is the FLIR an "Infrared open-path gas detectors" used in petrochemical industries? Could a small but continuous leak escape detection?
- l. CDP page 441, Table 3-1: The entire Livingston data is missing.
- m. CDP pages 488-538, Emissions Inventory and Impact Analysis: The mathematical model was for the original two well pads, Sheridan and Lowell. The results of the Livingston well pad with 19 wells ought to be different. A new analysis is necessary.
- n. The air quality section (pp 398-410) does not have information regarding the following:

<p>. What are the VOCs monitored? It should be noted that the CDPHE report “Screening Level Health Risk Evaluation from Inhalation of VOCs in Ambient Air...”, dated May 26, 2017 lists 60 different VOCs being monitored. The isoprene level, a carcinogenic VOC exceeded EPA safe level. In addition, will the Hydrogen Sulfide (H2S) emission be monitored continuously?</p> <p>. How the VOCs are monitored?</p> <p>. What instruments and/or sensors are used? See CDP page 405.</p> <p>. Are the VOCs monitored continuously or sampled? How often?</p> <p>. What are the quantities of hazardous materials to be brought on site and removed?</p> <p>. How are instruments and/or sensors calibrated? How often?</p> <p>. Page 402. 2.1.4 Production: Last paragraph states the “... well pad monitoring will be conducted continuously... to monitor pressures, temperature, flow, and production information.” Does it not monitor leaks? Why is this monitoring system not available during the other 2 phases (Drilling and Completions) of the energy development?</p>	
<p>8 Please deny the permits for this site until the following have been completed.</p> <p>1. Until the investigation of the Windsor explosion has been completed and the necessary steps have been taken by Extraction to keep this from happening again. My house would have been in the evacuation zone along with countless neighbors homes. How many people would have been hurt or killed had this happened at this site? There is no report as to why this happened and what steps are being taken to prevent this from happening again.</p> <p>2.I'm not sure how a permit can be given when the ownership of the minerals is in question. You cant give a permit to a company who does not own the minerals.</p> <p>3.Extraction Oil and Gas drilling plan has not been approved by Bloomfield. As per its MOU with the city this needs to be in place before drilling can begin.</p> <p>Please do your job and protect the citizens of Colorado. Its the law.</p>	02/23/2018
<p>9 Regarding the drilling permits, form 2, for the Livingston Pad in Broomfield, I urge you to not approve them. The City of Broomfield negotiated an MOU with Extraction in October 2017. Part of that MOU is that the city must approve Extraction’s drilling plan prior to them submitting permit applications to the COGCC. The city has not approved the drilling plan due to many errors and omissions in the plan. Extraction submitted their permit applications anyway, in violation of the MOU. The COGCC spacing orders for this spacing unit indicated that any wells permitted for this spacing unit must comply with the MOU. Since Extraction is not complying with the MOU the COGCC must not approve any related drilling permits if you are following the direction of your own spacing orders.</p> <p>In addition, the COGCC will have no money in their budget very soon. How can a regulator with no funds to pay their costs effectively do their job? If you have no funding regulate current oil and gas developments, then you certainly should not be approving any new permits for drilling until you have the funding.</p> <p>Finally, the COGCC is currently operating outside of the law based on the Martinez court decision. That decision states you must ensure health and safety first, before approving permits for drilling. Since you have taken no actions to determine if these drilling activities are safe in close proximity to homes, then no permits should be approved until they are proven safe.</p>	02/23/2018
<p>10 Regarding the drilling permits, form 2, for the Livingston Pad in Broomfield, I urge you to not approve</p>	02/23/2018

them. The City of Broomfield negotiated an MOU with Extraction in October 2017. Part of that MOU is that the city must approve Extraction's drilling plan prior to them submitting permit applications to the COGCC. The city has not approved the drilling plan due to many errors and omissions in the plan. Extraction submitted their permit applications anyway, in violation of the MOU. The COGCC spacing orders for this spacing unit indicated that any wells permitted for this spacing unit must comply with the MOU. Since Extraction is not complying with the MOU the COGCC must not approve any related drilling permits if you are following the direction of your own spacing orders.

In addition, the COGCC will have no money in their budget very soon. How can a regulator with no funds to pay their costs effectively do their job? If you have no funding regulate current oil and gas developments, then you certainly should not be approving any new permits for drilling until you have the funding.

Finally, the COGCC is currently operating outside of the law based on the Martinez court decision. That decision states you must ensure health and safety first, before approving permits for drilling. Since you have taken no actions to determine if these drilling activities are safe in close proximity to homes, then no permits should be approved until they are proven safe.

Total: 10 comment(s)