



July 31, 2018

Status Update and Approval Process

Section 9 of the [Operator Agreement](#) between Broomfield and Extraction Oil and Gas, Inc., requires Extraction to submit a Comprehensive Drilling Plan (CDP) for all six of the well sites and all 84 wells that Extraction intends to operate in Broomfield. The CDP is subject to administrative approval by the City and County Manager. The Operator Agreement requires that this administrative approval not be unreasonably withheld or delayed. The CDP is made up of 23 separate plans, covering such topics as air quality, noise, emergency management, risk management, and detailed site plans.

Extraction first submitted its draft CDP for review by Broomfield, in December, 2017. Since that time Extraction has submitted five more drafts of the CDP. Each draft of the CDP has been reviewed by Broomfield staff and consultants, with expertise in each of the issue areas. Broomfield sent Extraction detailed comments on each draft of the CDP, focusing comments on the protection of public health, safety, and welfare, including protection of the environment and wildlife resources. The first four drafts of the CDP and Broomfield's comments on each draft of the CDP can be found on Broomfield's website [linked here](#).

The May 11, 2018, draft CDP was discussed with City Council at two study sessions in June, 2018. On July 6, 2018, Broomfield staff sent a [letter to Extraction](#) detailing remaining City Council comments, citizen comments, and staff/consultant comments on the May 11, 2018, draft of the CDP. Subsequent to that time staff discussed with Extraction its final comments on the draft CDP, as contained in the July 6, 2018 letter, and Extraction agreed to address each of those final comments on the draft CDP. Extraction's response to each of those comments is indicated in green, in this [link to Broomfield's July 6, 2018, letter](#) on the draft CDP. Upon reviewing Extraction's response to each of these final comments on the Draft CDP, staff/consultants are satisfied that Extraction has addressed the remaining comments. The City & County Manager intends to approve the final CDP on August 2, 2018, after final review to confirm all of the final comments have been addressed as set forth in the July 6, 2018, letter in green, as contained in the link in this paragraph.

One of the outstanding issues in Broomfield's final comments on the CDP is with regard to Risk Management Plan, as contained in Section R of the CDP. Although the Operator Agreement does not require a quantitative or qualitative risk registry, Broomfield has consistently requested that Extraction indicate the various areas of risk, the mitigation measures and regulatory compliance that will address each of the risks, and an assessment by Extraction of the likelihood of such risk, once it is mitigated as set forth in the Risk Management Plan. Extraction indicated all of this information in the latest version of the Risk Management Plan that will be a part of the final CDP. A link to the final Risk Management Plan can be viewed [here](#).

A copy of the current draft of the CDP can be viewed [here](#).