

#### **DIRECTOR'S RECOMMENDATION:**

#### Docket #240100004

## Extraction Oil & Gas Inc, ("Extraction"); Operator Number 10459

#### Draco OGDP (OGDP ID #487059)

Pursuant to Rule 306, the Director submits to the Commission this recommendation for approval of this Extraction Oil and Gas Development Plan located in unincorporated Weld County.

The underlying permit documents in support of this Recommendation may be found through the Colorado Energy and Carbon Management Commission (ECMC) website under "Permits".

#### **Draco OGDP (OGDP ID #487059)**

Form 2C #403550329 Form 2A #403550304 Form 2B #403550315

All supporting hearing documents, including Extraction's Draco OGDP hearing application, may be found in ECMC's eFilings System under Docket No. 240100004.

#### **BACKGROUND**

On January 17, 2024, Extraction Oil & Gas Inc (Extraction) submitted an application for an Oil and Gas Development Plan (OGDP) with the Colorado Energy and Carbon Management Commission (ECMC). Staff returned the Form 2A to DRAFT status once on April 8, 2024 for the applicant to make corrections, and was resubmitted to the ECMC on May 8, 2024. ECMC Staff completed a second review of the application, and the Director determined that the application was complete on June 18, 2024. Technical review of the application has been conducted, and any issues have been resolved through coordination between Staff and the applicant. This Recommendation is based on information finalized in the Form 2A, the Form 2B, and the Hearing Application as of August 16, 2024. No additional revisions will be made to the application prior to the Commission Hearing scheduled for August 28, 2024.

#### PROPOSED DEVELOPMENT

The proposed Draco OGDP is located in unincorporated Weld County, and can be found on a map using the Latitude/Longitude coordinates of 40.033221, -105.003518. This OGDP covers approximately 3931.8 acres in Township 1 North, Range 68 West, and Township 1 North, Range 69 West. The proposed surface location is outside of the mineral development, and can be found in Lots one and two of Section 19, Township 1 North, Range 68 West, and Lots one and

two of Section 30, Township 1 North, Range 69 West. The proposed mineral development is the East half of Section 22, all of Sections 23-25, and portions of Sections 26 and 27 in Township 1 North, Range 69 West. The setting is in a moderately populated area, with the proposed surface location within irrigated cropland. The proposed surface location is situated to the North of Weld County Rd. 7, and West of Weld County Rd. 7, as shown below in Figure 1.



Figure 1: Approximate location of the proposed Draco OGDP Application Surface Location, indicated by the red X, using the Latitude and Longitude coordinates 40.033221, -105.003518.

Extraction plans to develop oil and gas at the proposed Draco location from 26 horizontal wells in the Niobrara, Fort Hays, Codell, and Carlile formations. The wells will be drilled using two drill rigs powered by line power simultaneously, and will be hydraulically fractured using tier IV or better engines. Three phase takeaway will be implemented at the proposed location, and Extraction is proposing a tankless, fully electrified production facility.

Extraction anticipates that construction of the location will begin in the third quarter of 2025, drilling and completions throughout the fourth quarter of 2025 and first quarter of 2026, and that the wells will be put into production in the third quarter of 2026.

#### **Surface Lands:**

The proposed location lies on FEE surface, and is outside of the proposed mineral development area. The right to construct is granted through a Surface Use Agreement. The OGDP requires approximately 19.69 acres of total disturbance as follows:

- Oil and Gas location disturbance (Draco): 19.45 acres (Approximately 10.41 acres for the Working Pad Surface (WPS)); interim reclamation will reduce the operational pad down to 5.24 acres.
- Access Road disturbance: 0.24 acres.
- Flowlines disturbance: No additional disturbance for the flowlines.

#### **DRILLING AND SPACING CONSIDERATIONS**

Extraction is requesting the development of FEE minerals covering approximately 3,931 total acres from the Niobrara, Fort Hays, Codell, and Carlile Formations as follows:

- Vacate: Order 407-2449, as amended by Order No. 407-2770.
- Establish a new Drilling and Spacing Unit (DSU)
  - The proposed DSU would establish approximately 3,931acres for oil and gas development and approve up to twenty six (26) horizontal wells.
    - Up to seventeen (17) horizontal wells targeting the Niobrara Formation.
    - Up to nine (9) horizontal wells targeting the Codell Formation
  - Extraction requests the following unit setbacks for the DSU:
    - Niobrara and Sharon Springs formations wells:
      - 600 feet from the unit boundaries; and
      - An interwell distance of 300 feet.

There are multiple wells producing or permitted to produce the Niobrara, Fort Hays, Codell and Carlile Formations, or portions thereof, within the application lands and within the proposed DSU boundaries; those wells will remain subject to their originally permitted spacing, and will not be included in this OGDP. This spacing, as outlined in Extraction's amended Hearing Application, complies with applicable ECMC rules.

#### FINANCIAL ASSURANCE

Staff confirmed that Extraction has a valid blanket plugging bond on record consistent with Rule 702.

#### **PUBLIC COMMENTS**

Pursuant to Rule 303.d.(1).A.ii, the Public Comment Period was open for 30 days from June 18, 2024 through July 18, 2024. There were three hundred and forty-three (343) unique comments received on the Form 2A, and seventy-five (75) unique comments received through the ECMC Hearings eFiling system during the Public Comment Period, for a total of 418 comments. Three (3) of the comments filed through the eFiling system were not considered, one (1) was regarding a different location, one (1) did not address oil and gas development, and the final comment was originally submitted by The Southern Land Company, who later submitted a petition to the docket to be an affected party pursuant to Rule 507. Extraction's response letter, and the ECMC's Public Comment Consideration Memo can be found on the Director's Recommendation.

#### LOCAL GOVERNMENT PERMITTING AND PRE-APPLICATION CONSULTATIONS

#### **Relevant Local and Proximate Governments:**

Weld County is the Relevant Local Government (RLG) for the proposed Draco OGDP, and the Town of Erie is the Proximate Local Government (PLG), which is located approximately 130 feet to the northwest of the WPS.

A pre-application meeting with Weld County was conducted on August 30, 2023, where representatives from Extraction, Weld County, the Colorado Department of Public Health and Environment (CDPHE), the Town of Erie, the Bureau of Land Management (BLM), Boulder County, and ECMC were present to discuss the proposed application. Additional information can be found on the Form 2A, under Document #403631034, labeled "LGD CONSULTATION." Extraction filed a 1041 Weld County Oil and Gas Location Assessment (1041 WOGLA) application with Weld County on November 7, 2023, and it was approved on February 29, 2024. The finalized WOGLA order can be found on the Form 2A, under Document #403777182, labeled "LOCAL/FED FINAL PERMIT DECISION."

#### **DIRECTOR'S CONSULTATIONS**

A CDPHE consultation pursuant to Rule 309.f was held between Extraction, CDPHE, the Town of Erie, and ECMC Staff on June 28, 2024. Best Management Practices (BMPs) were discussed and agreed upon in the meeting, and then committed to on July 1, 2024. A formal consultation summary letter was sent by CDPHE to Extraction and the ECMC Director on July 3, 2024. The agreed upon BMPs were added to the Form 2A, and the summary can be found as an attachment to the Form 2A, Document #2473685, labeled "CDPHE CONSULTATION." On August 8, 2024, CDPHE reached out to Extraction and the ECMC Director via email regarding a correction to the consultation summary, and this corrected summary can be found as an attachment to the Form 2A, Document #2473686, labeled "CDPHE CONSULTATION."

A CPW consultation pursuant to Rule 309.e was not required, and CPW did not request that a consultation happen. However, the proposed location is within 500 feet. of the ordinary high water mark (OHWM) of Community Ditch, and therefore Extraction contacted CPW to request a waiver from Rule 1202.a.(3). The waiver was granted by CPW on November 1, 2023, and has been attached to the Form 2A under document #403639239, labeled "CPW WAIVER." Staff supports CPW's waiver of Rule 1202.a.(3), and the Director grants an exception. Extraction has committed to wildlife BMPs, as discussed in the Wildlife Resource Consideration portion of this Recommendation.

#### **ECMC STAFF'S TECHNICAL REVIEW HIGHLIGHTS**

This section addresses issues related to public health, safety, welfare, the environment, and wildlife resources, as required by the Oil and Gas Conservation Act, § 34-60-106(2.5)(a), for the Extraction Draco OGDP.

#### <u>Alternative location Analysis (ALA) Considerations</u>

The proposed location meets one (1) of the ALA criteria listed in Rule 304.b.(2).B; Criteria i: The proposed Working Pad Surface (WPS) is within 2,000 feet. of one (1) or more Residential Building Units (RBUs) or High Occupancy Building Units (HOBU).

Extraction submitted an ALA for four (4) alternative locations. Through the technical review process, ECMC Staff concluded that the alternative locations in the analysis all have more or significantly closer RBUs, have HOBUs and School Facilities nearby, or are within the Town of Erie in an area zoned for residential and would require the area to be rezoned, and therefore, are not considered to be more protective to public health, safety, and welfare. Additional information regarding the alternative location analysis can be found on the Form 2A, Document #s403650986 and #403657917, labeled as "ALA DATASHEET" and "ALA NARRATIVE SUMMARY" respectively.

#### Public Health, Safety, and Welfare Considerations

During the technical review of the Draco OGDP, Staff noted and confirmed that Extraction had identified five (5) RBUs within 2,000 feet of the WPS, the closest being located 1,011 feet to the east. The nearest HOBU is located approximately 4,443 feet to the north, which is a School Facility, and there are no Child Care Facilities within one mile of the proposed WPS. The nearest Disproportionately Impacted Community (DIC) to the WPS is over a mile to the east.

Extraction has indicated that because there are RBUs within 2,000 feet of the WPS, they are seeking approval of this OGDP through Rule 604.b.(1). The operator has obtained signed letters of informed consent from the five (5) RBU owners and one (1) tenant within 2,000 feet, and the Informed Consent Letters can be found as an attachment on the Form 2A, Document #s403651102, 403651104, 403651106, 403651109, 403651114, and |403651125, labeled as "INFORMED CONSENT LETTER."

Extraction has committed to site-specific BMPs that include using a 32 foot. soundwall surrounding the WPS for drilling and completions, using two rigs powered by utility power simultaneously to drill the 26 horizontal wells, a quiet frac fleet for completion, Group III muds with a closed loop system, three phase takeaway for produced water, oil, and gas, a tankless production facility, an electrified production facility, and no permanent lighting once the wells are on production.

#### **Environmental Resource Considerations**

#### Water Resources:

Extraction has indicated on the Form 2A that the proposed location is within a Sensitive Area for water resources. The nearest constructed water well is 1,169 feet to the south of the proposed location, and depth to groundwater is estimated at 11 feet. The nearest downgradient surface Waters of the State and downgradient wetland is an emergent wetland 1,116 feet to the south of the proposed location. Community Ditch runs along the northwest side of the proposed location, approximately 100 feet from the WPS and is upgradient, therefore Extraction requested a

waiver from CPW for Rule 1202.a.(3) regarding the staging, refueling, or chemical storage within 500 feet. of the OHWM of the isolated wetland. CPW granted the waiver on November 1, 2023.

Extraction has committed to stormwater BMPs, including the use of a polyethylene liner during the drilling and completions, secondary containment for all chemical storage, remote shut in capabilities using a SCADA system, and Leak Detection and Repair (LDAR) program, and the use of berms and ditches, and sediment control logs in order to minimize and mitigate potential impacts to the nearby ditch, and shallow groundwater.

#### **Wildlife Resource Considerations**

Staff evaluated the location for the potential for adverse impacts to wildlife resources through desktop review and Extraction's Wildlife Protection Plan. The location is not within an HPH. The nearest HPH is a Aquatic Native Species Conservation Waters approximately 2,495 feet to the southeast of the WPS.

Extraction has committed to BMPs such as conducting migratory bird surveys if construction activities begin within the recognized migratory bird breeding season (April 1 to August 31), and using berms and ditches, and sediment control logs to protect the nearby Community Ditch with an OHWM.

#### **DIRECTOR'S RECOMMENDATION:**

The Director has obtained and fully reviewed all required and supplemental information necessary to evaluate the OGDP's proposed operation and its potential impacts on public health, safety, welfare, the environment and wildlife resources. Through this review, the Director has determined that this OGDP complies with all applicable requirements of the Commission's Rules and recommends approval by the Commission.



July 3, 2024

Julie Murphy, Director
Energy and Carbon Management Commission
1120 Lincoln St, Suite 801
Denver, CO 80203

Re: Colorado Department of Public Health and Environment's Rule 309.f Consultation Comments for the Extraction Draco Oil and Gas Development Plan (Docket Number 240100004)

The Colorado Department of Public Health and Environment (CDPHE) appreciates the opportunity to consult on the Extraction Draco Oil and Gas Development Plan (OGDP), as well as the ongoing collaboration with the Colorado Energy and Carbon Management Commission (ECMC) to fulfill our shared mission to protect public health and the environment. CDPHE's consultation timeline for this OGDP is as follows: CDPHE was contacted initially by Weld County as part of their local process on December 22, 2023. CDPHE was contacted initially by ECMC staff on June 18, 2024. CDPHE provided the Best Management Practices (BMPs) spreadsheet for CDPHE-ECMC Consultations to the operator, Civitas (Extraction parent company), on June 20, 2024. Civitas provided to CDPHE its completed BMP spreadsheet for the Draco OGDP on June 27, 2024. At their request, a consultation with a designee of the Town of Erie, a proximate local government, was held on June 28, 2024. A consultation meeting including CDPHE, ECMC, and Civitas was held on June 28, 2024. No revisions were requested by CDPHE. Civitas agreed with committed BMPs as listed on July 1, 2024.

CDPHE notes that the proposed Draco OGDP contains one pad of the same name. There are five residential building units (RBUs) within 2,000 feet of the pad. The OGDP is located within the Denver Metro/North Front Range Ozone Nonattainment Area. The pad in the OGDP is not within the boundaries of an identified Disproportionately Impacted Community area.

The Town of Erie contacted CDPHE requesting inclusion in the consultation process prior to the application passing completeness with the ECMC. CDPHE notes after consultation with the local government that the proposed Draco Pad is directly adjacent to the Westerly housing development project to the northwest currently under construction with planned expansions. Figure 1. Shows an overlay of the proposed pad location with a 2,000 ft buffer radius on the housing development plat. Westerly currently has 534 residential lots undergoing



construction (Filings 1 and 2), 250 residential lots (Filing 3) in local process with expected construction starting by end of 2024, and 264 residential lots in local process with expected permitting in 2025. CDPHE notes that this development (existing, under construction, and planned) would not place additional residential building units within 2,000 ft as it is planned to be open space. CDPHE also notes this significantly increases the number of residents within one mile of the pad subject to potential health risk from emissions during long-term production, but likely not during the pre-production phase.

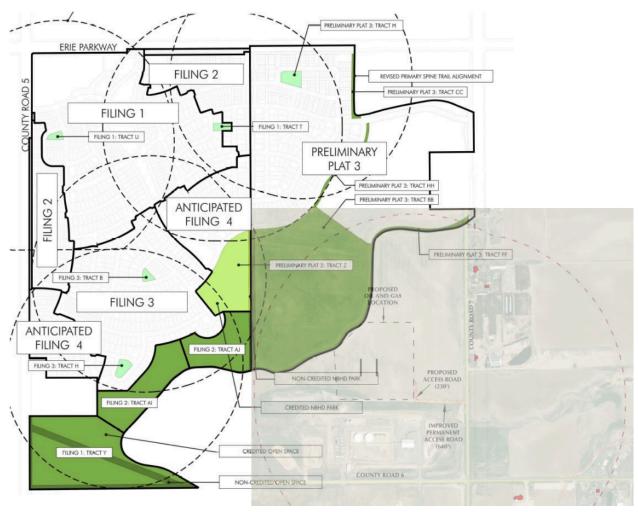


Figure 1. Development Map of Westerly Housing Development, overlaid by surface map submitted by Operator. Images sourced from public documents filed with 1) Town of Erie, and 2) ECMC.

CDPHE believes much of this risk is appropriately minimized through the BMPs which Civitas has committed to such as a tankless and grid-powered production facility. CDPHE strongly



encourages long-term transparency, accessibility, and outreach from the Operator to current and future residents in the Westerly housing development area.

To protect public health and air and water resources, CDPHE supports incorporation of each of the BMPs that Civitas has committed to in the Draco OGDP, as listed below:

- Operator will properly maintain vehicles and equipment
- Operator will use non-emitting pneumatic controllers
- Operator will use electric drilling rigs if available, and will demonstrate best-effort if unable to utilize them
- Operator will use Tier IV or equivalent engines, such as NG Tier II w/ battery assist, (or better) for hydraulic fracturing (dual-fuel engines are not considered equivalent)
- Operator will use electric equipment and devices (e.g. vapor recovery units or VRUs, fans, etc.) to minimize combustion sources on site (if yes, operator will provide a list outlining which equipment and devices will be electrified)
- Operator will use Tier IV or equivalent engines, such as NG Tier II w/ battery assist, (or better) for nonroad construction equipment (dual-fuel engines are not considered equivalent)
- Operator will not store hydrocarbon liquids in permanent storage tanks on site (other than a maintenance tank possibly used for well unloading or other maintenance activities)
- Operator will not store produced water in permanent storage tanks on site (other than a maintenance tank possibly used for well unloading or other maintenance activities)
- Operator will implement a "hybrid or modern" production flowback method (eliminates tanks by routing the oil, natural gas and water directly to permanent production equipment)
- Operator will use pipelines to transport water used for hydraulic fracturing to location
- Operator will have adequate and committed pipeline takeaway capacity for all produced gas and oil and water
- Operator will shut in the facility to reduce the need for flaring if the pipeline is unavailable
- Operator will use lease automatic custody transfer (LACT) system to remove/reduce the need for truck loadout
- Operator will use OGP Group III drilling fluid
- Operator will cover trucks transporting drill cuttings
- Operator will use a squeegee or other device to remove drilling fluids from pipes as they exit the wellbore
- Operator will ensure that all drilling fluid is removed from pipes before storage
- Ozone mitigation on forecasted high ozone days: operator will eliminate use of VOC paints and solvents
- Ozone mitigation on forecasted high ozone days: operator will minimize vehicle and engine idling
- Ozone mitigation on forecasted high ozone days: operator will reduce truck traffic and worker traffic



- Ozone mitigation on forecasted high ozone days: operator will postpone the refueling of vehicles
- Ozone mitigation on forecasted high ozone days: operator will suspend or delay the use of non-essential fossil fuel powered ancillary equipment
- Ozone mitigation on forecasted high ozone days: operator will reschedule non-essential operational activities such as pigging, well unloading and tank cleaning
- Ozone mitigation on forecasted high ozone days: Operator will postpone flowback if emissions cannot be adequately captured with a vapor recovery unit (VRU)
- Operator will use Modular Large Volume Storage Tanks
- Operator will not use fracturing fluids which contain PFAS compounds
- Operator will contribute to nearby fire district(s) to support transition away from PFAS-containing foam through funding, buy-back program participation/promotion, etc.
- Operator will coordinate with nearby fire district(s) to evaluate whether PFAS-free foam can provide the required performance for the specific hazard
- If PFAS-containing foam is used at a location: operator will properly characterize the site to determine the level, nature and extent of contamination
- If PFAS-containing foam is used at a location: operator will perform appropriate soil and water sampling to determine whether additional characterization is necessary and inform the need for and extent of interim or permanent remedial actions
- If PFAS-containing foam is used at a location: operator will properly capture and dispose of PFAS-contaminated soil and fire and flush water

CDPHE has run Colorado EnviroScreen and APCD Regulation 3 analyses on this site, with an overall score of 46.63. The related report may be viewed as an appendix to this letter.

CDPHE appreciates this opportunity to consult and looks forward to continued collaboration with ECMC. CDPHE also appreciates both the Town of Erie and Civitas's attentive and timely engagement during this process and we have no additional recommendations at this time. Please do not hesitate to contact me if you have any questions.

Sincerely,

Tessa Sorensen Energy Liaison

Colorado Department of Public Health & Environment









# **Environmental Justice Report**

## **Applicant Information**

Company Name: Civitas - Extraction

Facility Name: Draco
Plant AIRS ID Number:
Permit Type: OGDP
Permit Number:

Facility location used for generating the report: 40.03322 , -105.0035

## **Environmental Justice Summary**

**Weld County** 

Census Block Group 081230020091

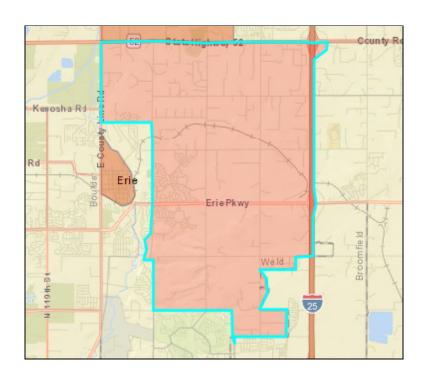
Air Quality Reg. 3 Disproportionately Impacted (DI) Community

No

Air Quality Reg. 3 Community Type

Not Disproportionately Impacted

Low-income Population	8.9%
People of Color Population	12.7%
Limited English Proficiency Population	0.7%
Housing Cost Burdened Population	29.6%
CO EnviroScreen Percentile Score	46.63



## **Environmental Justice Overview**

## Environmental Exposures Percentile Score 77.1

The environmental exposures score represents a community's exposure to certain environmental risks relative to the rest of the state. The score ranges from 0 to 100, with higher scores indicating higher burden. The environmental exposures score does not cover all pollutants; it is the average of data on diesel particulate matter, traffic proximity, ozone, PM 2.5, air toxics, other air pollutants, lead exposure risk, drinking water violations, and noise.

Environmental Effects Percentile Score 42.95

The environmental effects score represents how many hazardous or toxic sites are in a community relative to the rest of the state. The score ranges from 0 to 100, with a higher score indicating higher burden. The score is the average of data on proximity to mining, oil and gas operations, impaired surface waters, wastewater discharge facilities, Superfund sites, facilities that use hazardous chemicals, and facilities that generate, treat, store, or dispose of hazardous wastes.

#### Climate Vulnerability Percentile Score 46.86

The climate burden score represents a community's risk of drought, flood, extreme heat, and wildfire compared to the rest of the state. The score ranges from 0 to 100, the higher the score, the higher the burden.

#### Sensitive Populations Percentile Score 64.3

The sensitive populations score captures how at risk a community is to environmental exposures and climate impacts as it relates to health. For example, air pollution has stronger impacts on older and younger people, and people with chronic conditions such as asthma. The score ranges from 0 to 100, with a higher score being worse. The score is calculated using data on asthma hospitalization rate, cancer prevalence, diabetes prevalence, heart disease prevalence, life expectancy, low birth weight rate, mental health, population over 65, and population under 5.

#### Demographics Percentile Score 17.5

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The demographics score represents a community's social and economic vulnerabilities. The score ranges from 0 to 100, with a higher number representing a higher vulnerability. It is calculated using data on people living with disabilities, housing cost burden, educational attainment, limited English proficiency, income, and race and ethnicity.

#### One-mile radius with satellite imagery for facility: Draco



Image above notes a one-mile radius from the location in the center of the circle.



One-mile radius around location used to generate report

An aerial or satellite image of the facility, including a one-mile radius of the surrounding area, is a required component for the Environmental Justice Summary.

This image was generated from the Environmental Justice Report Tool for Air Quality Regulation 3 using the ESRI World imagery basemap. The map features Maxar imagery at 0.3m resolution for select metropolitan areas around the world and 0.5m resolution across the United States. In addition to commercial sources, the World Imagery map features high-resolution aerial photography contributed by the GIS User Community. This imagery ranges from 0.3m to 0.03m resolution (down to ~1:280 in select communities).

For more information, visit: World Imagery

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## **Pollution and Climate Indicators**

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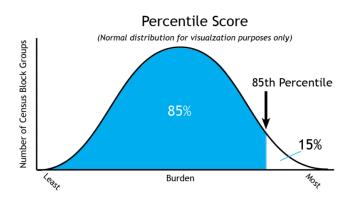
Indicator	Original Unit of Measure	Percentile
Air Toxics Emissions	distance weighted measure of estimated air toxics emissions	99.09
Diesel Particulate Matter	micrograms per cubic meter	60.79
Drinking Water Regulations	population weighted duration (in weeks) of resolved and unresolved health based violations from active community public water systems	83.49
Fine Particle Pollution (PM 2.5)	micrograms per cubic meter	83.8
Impaired Streams and Rivers	average impairment and assessment status of streams	75.78
Lead Exposure Risk	percentage of housing units built before 1960, as an indicator of potential exposure to lead	44.68
Noise	decibles A	29.05
Other Air Pollutants	distance weighted measure of estimated other air pollutant emissions	98.24
Ozone	parts per billion	43.23
Proximity to Hazardous Waste Facilities	distance weighted count of hazardous waste facilities within 5 km	23.24
Proximity to Mining Locations	distance weighted measure of the total number of active coal, hard rock, and construction materials mining permits	86.55
Proximity to National Priorities List Sites	distance weighted count of proposed or listed NPL sites with 5 km	42.41
Proximity to Oil and Gas	distance weighted measure of the total number of active oil and gas locations	98.81
Proximity to Risk Management Plan Sites	distance weighted count of RMP facilities within 5 km	16.25
Traffic Proximity and Volume	amount of vehicular traffic nearby, and distance from roads	29.22
Wastewater Discharge Indicator	toxic chemical concentrations in stream segments per km	74.69
Drought	sum of weekly total percent of an area experiencing a severe, extreme, or exceptional drought	22.93
Extreme Heat Days	average number of high heat days between May and September from 2016 to 2020	47.37
Floodplains	percentage of each geographic area where there is at least a one percent chance of flooding annually	70.72
Wildfire Risk	mean wildfire hazard potential within each geographic area as determined by the US Forest Service, 2021	81.74

## **Health and Social Indicators**

Indicator	Orignial Unit of Measure	Percentile
Asthma Hospitalization Rate	rate of hospitalization per 100,000 people	49.55
Cancer Prevalence	percent of adults	86.27
Diabetes Prevalence	percent of adults	9.05
Heart Disease in Adults	percent of adults	90.35
Life Expectancy	years	0
Low Birth Weight	percent of singleton births	33.72
Mental Health Indicator	percent of adults	47.46
Population over 64 years of age	percent of total population	51.27
Population under 5 years of age	percent of total population	84.43
Disability	percent of total population	11.76
Housing Cost Burdened	percent of total population	49.83
Less Than High School Education	percent of total population	19.48
Linguistic Isolation	percent of total population	55.73
Low Income	percent of total population	16.83
People of Color	percent of total population	23.02

## Understanding the Data

The values shown in the Pollution and Climate Indicator and Health and Social Indicator tables are percentiles. Percentiles are a way to see how one area compares to other areas in Colorado. Percentile values range from 0 - 100. A higher score indicates higher burden. Specifically, the percentile tells you the percentage of places in Colorado that have a lower score than the selected location. For example, an area with 85 percentile score for the noise indicator, ranks in the top 15% of areas impacted by noise in Colorado. That means that 85% of the other Census Block Groups in Colorado have a lower score for noise impacts.



The data in the report comes from Colorado EnviroScreen version 1.0. Developed in 2022 by CDPHE and Colorado State University, EnviroScreen maps the overlap of environmental exposures and effects, climate vulnerability, sensitive populations, and demographics to better understand environmental injustice and environmental health risks in Colorado. For more detailed information on the data sources used in Colorado EnviroScreen Version 1.0 see the technical documentation.

On the first page of the report, red text highlights if values for a census block group meet or exceed the criteria for definition of Disproportionately Impacted Community for Air Quality Regulation 3. On subsequent pages of the report, red text highlights indicators in the top percentiles for Colorado that may warrant additional consideration during the permitting process. The Environmental Justice Report is not intended to show individual health risk or exposure.

In the Environmental Justice Summary on the first page, values shown in red indicate a census block group that meets or exceeds the following criteria to qualify as a Disproportionately Impacted (DI) Community for Air Quality Reg 3:

- Over 40% of households are low-income (meaning they are at or below 200% of the federal poverty level),
- Over 40% of the population identify as people of color,

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- Over 50% of households are housing-cost burdened (meaning they spend more than 30% of household income on housing costs), or
- Over 20% of the population is linguistically isolated (meaning no adults in a household speak English well).

A census block group that meets or exceeds any of these percentages is labeled as a Socioeconomically Vulnerable Community (SVC).

The CO EnviroScreen Percentile Score, which is also found on the first page of the Environmental Justice Report, is written in red if it is above the 80th percentile. A census block group with a CO EnviroScreen Score above the 80th percentile is labeled as a Cumulatively Impacted Community (CIC).

In other sections of the Environmental Justice Report, including the Environmental Justice Overview, Pollution and Climate Indicators, and Health and Social Indicators sections, indicator and component scores over the 80th percentile

are also highlighted in red. The 80th percentile threshold is used in most cases to flag census block groups that have indicators and groups of indicators (components) that are in the top 20% of census block groups in Colorado. These indicators and components are flagged because they may warrant further review in the permitting process by the permit applicant and/or the Division staff reviewing the permit.

For most indicators, the indicator is highlighted in red if it is above the 80th percentile to indicate that the census block group where the facility is located faces higher risks based on that indicator compared to other Colorado communities. However, less than 20% of census block groups in Colorado have oil and gas facilities or mining locations. Accordingly, all census block groups in Colorado score above the 80th percentile for proximity to these two types of facilities because even having zero facilities puts a community in the top 20%. Accordingly, the Environmental Justice Report highlights a census block group in red if it is above the 85th percentile for mining facilities and above the 90th percentile for oil and gas facilities. This ensures that only census block groups with a greater number of facilities than the statewide average of zero are highlighted on the EJ Report.

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#### **Colorado EnviroScreen does:**

- -Show which areas in Colorado are more likely to have higher environmental health injustices.
- -Identify areas in Colorado where government agencies can prioritize resources and work to reduce pollution and other sources of environmental injustice.
- -Provide information to empower communities to advocate to improve public health and the environment.
- -Identify areas that meet the updated definition of "Disproportionately Impacted Community" under House Bill 23-1233 adopted a definition that applies to all state agencies, including CDPHE.
- -Identify areas where the Air Quality Regulation (Reg.) Number 3, which governs permitting in disproportionately impacted communities, applies.
- -Identify areas that meet the prior definition of "Disproportionately Impacted Community" under the Colorado Environmental Justice Act (HB21-1266).

#### **Colorado EnviroScreen does not:**

- -Define a healthy or unhealthy environment.
- -Establish causal associations between environmental risks and health.
- -Define all areas that may be affected by environmental injustice or specific environmental risks.
- -Provide information about an individual person's health status or environment.
- -Take all environmental exposures into account.
- -Tell us about smaller areas within a census block group that may be more vulnerable to environmental exposures than other areas.
- -Provide information about non-human health or ecosystem risks.

#### Additional Resources

Frequently Asked Questions: Environmental Justice Report Tool for Air Quality Regulation 3

Air Pollution Control Division's Small Business Assistance Program

**CDPHE Environmental Justice Program** 

Report Created: Friday, June 28, 2024

Colorado EnviroScreen Version 1.0 Reports, Guides, and Resources Folder



August 8, 2024

Aaron Ray, Interim Director Energy and Carbon Management Commission 1120 Lincoln St, Suite 801 Denver, CO 80203

Re: Correction Statement for Colorado Department of Public Health and Environment's Rule 309.f Consultation Comments for the Extraction Draco Oil and Gas Development Plan (Docket Number 240100004)

In the consultation comments letter issued by CDPHE to the ECMC on July 3, 2024, a statement has been found to be inaccurate. In that letter, on page 2 and in reference to a current and future housing development known as Westerly, CDPHE stated "CDPHE notes that this development (existing, under construction, and planned) would not place additional residential building units within 2,000 ft as it is planned to be open space."

The Town of Erie, the local government responsible for regulating this housing development, contacted CDPHE with a correction on August 8, 2024. The Town of Erie's planning department has plats on file for this development showing the area within 2,000 of the proposed Working Pad Surface (WPS) to potentially include at least 40 residential lots (Figure 2.). The plats have not been granted final approval at the time of this correction.



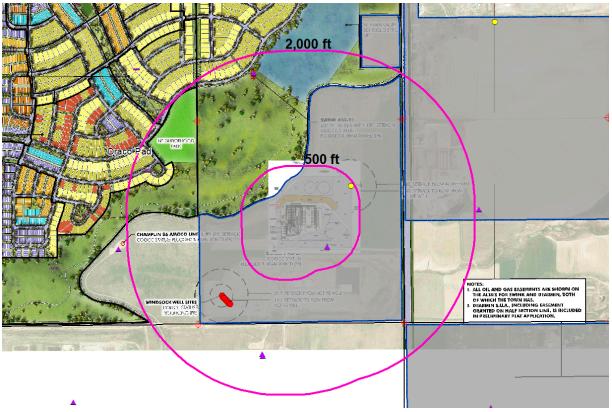


Figure 2. Magnified Development Map of Westerly Housing Development, overlaid by surface map submitted by Operator. Images sourced from public documents filed with 1) Town of Erie, and 2) ECMC, with additional radius drawings by Town of Erie personnel.

This information does not change the findings or conclusions stated by CDPHE in the original consultation comments letter.

CDPHE appreciates the continued collaboration and engagement of the Town of Erie during this process and we have no additional recommendations at this time. Please do not hesitate to contact me if you have any questions.

Sincerely,

Tessa Sorensen Energy Liaison

Colorado Department of Public Health & Environment





August 12, 2024

Colorado Energy and Carbon Management Commission Attn: Mr. Aaron Ray, Interim Director 1120 Lincoln Street, Suite 801 Denver, Colorado, 80203

Re: Draco OGDP - Consolidated Public Comment Response ECMC Docket Number 240100004

Weld County, Colorado

Dear Director Ray:

Extraction Oil and Gas, Inc. (Extraction) would like to thank each of the public commentors that took the time to comment on our proposed Draco OGDP. Their concerns and engagement are a valuable part of the Colorado Energy and Carbon Management Commission (ECMC) process. Our neighboring communities are our communities, too, and operating safely and responsibly on the land we all share is at the core of our operations. We work closely with local and state safety officials to exceed regulatory standards and to ensure that our neighboring communities have transparent, comprehensive information about our operations. Extraction is committed to safe carbon neutral development of natural resources at the Draco development and along the Front Range of Northern and Central Colorado. We maintain and develop the highest operating standards in the industry, and our commitment to producing energy responsibly minimizes our environmental footprint and benefits the communities in which we operate. We look forward to continuing to adhere to these operational standards at the Draco Pad.

The following sections outlines the primary concerns raised in public comments and Extraction's corresponding responses.

#### Aquifer Protection and Hydraulic Fracturing Fluid Constituents Concerns

The oil and natural gas industry coordinates with the ECMC regarding all water related regulatory oversight. To protect and safeguard our water sources, each of our wells is lined with multiple concentric layers of steel and cement casing to ensure proper well construction and integrity. Horizontal drilling will occur well below the water table – at minimum, 7,500' below ground level. For reference, that equates to hydraulic fracturing activity occurring at roughly 22 football fields below the nearest source of groundwater.

Hydraulic fracturing fluid, or "fracking fluid," is 99.5 percent water and sand. The remaining percentage is made up of chemicals commonly found in everyday products, such as toothpaste, detergent, and even ice cream, that often can be purchased at your grocery store.

#### Water Use Concerns

Extraction works with public and private water suppliers to lease water or excess water that's not in competition with residential users. Extraction commits to utilizing approximately 6.7 million gallons of recycled water as an input to planned completion operations at the Draco Development.



#### **Offset Wells Protection Concerns**

The ECMC requires all operators to review the well records of plugged and abandoned wells within 1500 feet of each planned new lateral well. The ECMC independently reviews these same wells and requires additional investigations as necessary. Additionally, Extraction reviews well records of abandoned wells withing 2000 feet of each planned new lateral well.

#### Plugging and Abandoning Operations Concerns

Extraction has committed to collaborating with the Town of Erie to plug and abandon 22 legacy wells and associated infrastructure. Although a specific abandonment timeline cannot be provided at this time, Civitas will work closely with the Town of Erie to adhere to their regulatory requirements and standards once we have a firm timeline for the plugging and abandoning operations.

#### Air Quality Concerns

Civitas has a proven track record of industry-leading emissions reductions achieved through the implementation of best practices. These same strategies will be applied at the Draco Pad to eliminate emissions at the source.

#### 1. Utility Power and Reduced Emissions

- Drilling and production operations will be powered by utility electricity.
- Completions operations will utilize a low-emission Tier IV equivalent fleet.

#### 2. State-of-the-Art Facilities and Operations

- Compressed air pneumatics will replace natural gas for all pneumatic actuation on location.
- A pressurized maintenance vessel will be used, eliminating gas venting during maintenance.
- Extraction will utilize a tankless design. Eliminating emissions associated with oil and water storage and processing tanks.
- Continuous air monitoring will be conducted in accordance with CDPHE regulations.
- Rigorous inspection, leak detection, and repair protocols will be implemented.

#### 3. Legacy Well Remediation and Emissions Offset

- Civitas is committed to plugging and abandoning 22 legacy oil and gas facilities, eliminating 4.86 tons of VOC emissions annually.
- To offset any remaining direct emissions (Scope 1), we purchase certified offsets from the four largest and most reputable registries.
- Indirect emissions (Scope 2) are offset through green e-certified renewable energy credits, resulting in carbon-neutral operations.

By combining these strategies, Civitas is demonstrating its commitment to environmental stewardship and sustainable operations.

#### **Health Concerns**

On February 21, 2017, CDPHE released the "Assessment of Potential Public Health Effects from Oil and Gas operations in Colorado". Following that report, the CDPHE released another study (October 17, 2019) titled, Human Health Risk Assessment for Oil & Gas Operations in Colorado. The earlier study reviewed more than 10,000 air samples in regions of Colorado where people are living near oil and natural gas development. It concluded that all



measured air concentrations were below short- and long-term safe levels. The second 2019 study took the air measurements further by developing a dispersion model, with layers of conservative measures considered.

Since those studies have been conducted, oil and gas operators, and Extraction specifically, have undergone a paradigm shift in industry practices, specifically during flowback. Today's flowback techniques eliminate any open air flowback tanks and in some cases, all tanks. These changes have eliminated many of the emission sources previously implicated in air quality impacts.

In 2019, Extraction built upon these third-party studies and worked with CTEH, LLC (CTEH) to design and perform monitoring studies to characterize the short- and long- term impacts on local air quality and public health from discrete operational phases at ongoing oil and gas development. These studies were performed alongside operations that employed a variety of best management practices.

Finally, Extraction's operations have been overseen by the Colorado Air Monitoring Mobile Lab (CAMML) to collect science-based third-party data near well pads that employ a variety of best management practices. All data from these monitoring studies can be found in the references. In these instances, the CAMML has repeatedly shown that oil and gas development can be performed safely and without exceeding criteria established by regulation for the protection of public health, welfare, and the environment.

#### **Geologic Concerns**

Extraction has thoroughly analyzed data from nearby wells and coal mine maps in the area. Our findings confirm that the proposed Draco Pad oil and gas location and associated well head locations will not intersect with any existing coal mines. Moreover, the wells will be drilled and completed at a depth exceeding 7,000 feet below the deepest point of any nearby coal mine.

#### Seismic Activity Concerns

There is no documented correlation between seismicity or surface disturbances and producing wells within the DJ Basin, which includes approximately 15,000 wells drilled in the past decade many of which are beneath neighborhoods.

#### **Traffic Concerns**

Prior to commencing operations at the Draco Pad, Extraction will commission a Traffic Impact Analysis (TIA) and a Traffic Impact Survey (TIS) from a qualified independent traffic expert for pre-production operations truck traffic. We will collaborate with the Town of Erie to implement appropriate traffic mitigation measures based on these studies.

Due to the installation of oil and produced water pipeline takeaways, minimal truck traffic is anticipated during production operations.

#### **Noise Concerns**

**Pre-Production:** Sound walls will be erected around the location prior to the commencement of the drilling phase and will remain until the completions phase is completed; these walls stand 32' tall and utilize acoustic fabric to aid in the attenuation of sound emanating from equipment on the location. Additionally, a utility powered drilling rig will be used during drilling operations and a "quiet completions fleet" will be used for hydraulic fracturing.



**Production:** Utility powered facilities will be utilized during production operations mitigating a majority of the noise generated during production operations.

#### **Light Concerns**

**Pre-Production:** Lighting will be carefully managed to minimize light pollution. Lights will be angled downward to reduce halo effects, and their height will be adjusted to prevent light spillage onto neighboring properties. Only lights essential for safety and regulatory compliance will be used.

**Production:** No permanent lighting will be installed on the location eliminating any potential impacts from lighting during production operations.

#### **Viewshed Concerns**

The Draco development incorporates multiple BMPs that reduce or eliminate visual impacts, both perceived and real. During development operations the pad will be screened by a 32-foot full wrap soundwall, effectively eliminating sight lines to all but the tallest equipment utilized during the development effort. After production has commenced, the well pad will be modified to incorporate soil berms and fencing to limit or eliminate sight lines from existing or planned neighboring communities.

#### **Extended Reach Laterals Concerns**

Civitas Resources, Inc., Extraction's parent company, possesses substantial expertise in drilling and completing extended reach laterals within the DJ Basin. Civitas and its subsidiaries have successfully drilled and completed wells comparable to those proposed for the Draco Development.

Please feel free to contact us with questions or for more information.

Sincerely,

Jeff Annable

Manager, Well and Location Permitting

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Extraction Oil & Gas, Inc.

## Public Comment Consideration Memo Extraction Oil and Gas Inc - Draco Oil and Gas Development Plan (OGDP) (Docket# 240100004)

On January 17, 2024, Extraction Oil and Gas Inc (Extraction), filed an application for their Draco OGDP (Draco) with the ECMC. The Director determined the application was complete on June 18, 2024. Pursuant to Rule 303.d.(1).A.ii, the public comment period for the Draco was open from June 18, 2024 through July 18, 2024, during which time 418 public comments were received from 399 unique commenters. Of the public comments received, 343 were submitted to the Form 2A in Webforms, and 75 were submitted through the ECMC Hearings eFiling system. Three comments were excluded from consideration in this memo. One addressed a different OGDP application and one did not address oil and gas development. The final excluded comment was from Southern Land Company, who submitted a public comment, and then later filed a petition pursuant to Rule 507 to be an affected party, which takes precedence over the public comment. ECMC staff reviewed and considered all public comments received within the public comment period and have prepared this memo to address them.

Due to the large number of public comments received, ECMC staff have elected to categorize the concerns expressed in the public comments and provide a response to each category of concern as opposed to an individual response to each public comment. After reviewing all public comments received, the following categories of concern have been identified and are addressed below:

- Health and Safety Impacts
- Proximity to Residences and Schools
- Air Quality
- Environmental Impacts and Wildlife
- Water Usage
- Spills and Releases
- Water Impacts
- Hazards in Drilling Area
- Nuisance Impacts
- Cumulative and Long Term Impacts
- Lack of Trust in Drilling Plan or Operator
- Public Welfare
- Risk to & Cost to Maintain Local Infrastructure
- Greenhouse Gas Emission and Climate Change
- Community Outreach
- Induced Seismicity
- General Opposition to Oil and Gas
- Fire and Explosion
- Disproportionately Impacted Communities

#### **PUBLIC COMMENT CATEGORIES**

Health and Safety Impacts (233 Comments, 56.14%)

These comments expressed concerns regarding impacts to public health and safety. ECMC Rule 303.a.(5).B.ii. outlines the informational requirements operators must evaluate and address in an OGDP regarding adverse impacts to public health and safety. This includes a quantitative evaluation of the projected incremental increase in emissions of various pollutants, estimated for the entire proposed OGDP, and can be found on the Form 2B, Document #403550315.

The Colorado Department of Public Health and Environment (CDPHE) consulted on this OGDP pursuant to Rule 309.f on June 28, 2024, where Best Management Practices (BMPs) were discussed and committed to by Extraction. The CDPHE consultation can be found as an attachment to the Form 2A, Document #2473685, labeled "CDPHE CONSULTATION."

## Proximity to Residences and Schools (219 Comments, 52.77%)

These comments expressed concerns regarding the proximity of residences and schools to the proposed Draco location. 219 comments (52.77%) mentioned proximity to residences, proximity to schools, or both. Specifically, 216 comments (52.05%) expressed concerns about residences and 29 comments (6.99%) expressed concerns about schools. Note that comments mentioning both residences and schools were counted in each individual category, but only counted once in the total count of comments addressing either concern.

Working pad surfaces must be greater than 2,000 feet from a Residential Building Unit (RBU), unless one or more of the conditions outlined in Rule 604.b. are met. If a working pad surface is within 2,000 feet of a residential building unit, an Alternative Location Analysis (ALA) must be conducted by the operator. There are 5 RBUs within 2,000 feet of the proposed Draco location, and Extraction has secured Informed Consent from all 5 owners, as well as the 1 tenant of the RBUs, and is seeking approval of this OGDP through Rule 604.b.(1). Extraction submitted an ALA for 4 alternative locations, and additional information can be found on the Form 2A, Document #s403650986 and #403657917, labeled as "ALA DATASHEET" and "ALA NARRATIVE SUMMARY" respectively.

Rule 604.a. requires working pad surfaces to be greater than 2,000 feet from School Facilities or Child Care Centers. The nearest School Facility is located approximately 4,443 feet to the north of the proposed Draco location.

#### Air Quality (159 Comments, 38.31%)

These comments expressed concerns regarding impacts to air quality. ECMC Rule 303.a.(5).B.i. outlines the informational requirements operators must evaluate and address in an OGDP regarding adverse impacts to air resources. This includes a quantitative evaluation of the projected incremental increase in emissions of various pollutants, estimated for the first year of production, and can be found on the Form 2B, Document #403550315.

Extraction has committed to multiple BMPs to avoid, mitigate or minimize impacts to air quality, including utilizing two electric line powered drill rigs simultaneously, Tier IV engines for completions, a tankless and fully electrified production facility, and three phase pipeline takeaway for oil, gas, and produced water.

#### Environmental Impacts and Wildlife (152 Comments, 36.63%)

These comments expressed concerns regarding impacts to the environment (147 comment,

35.42%) and wildlife resources (11 comment, 2.65%). ECMC Rule 1003.e.(2) states that, on locations that are classified as non-crop lands (not used for crop production), once the area has been stabilized, operators are encouraged to reseed with species consistent with the adjacent plant community. This interim reclamation is not deemed as complete until there is 80% plant cover of pre-disturbance levels or references areas, excluding noxious weeds.

The rules of ECMC are to regulate Oil and Gas Operations in a manner to protect and minimize adverse impacts to public health, safety, welfare, the environment and wildlife resources, and to protect against adverse environmental impactions on any air, water, soil or biological resource resulting from Oil and Gas Operations. All Operators are held to this standard and provide plans and best management practices in order to mitigate adverse effects to the environment.

High Priority Habitat (HPH) maps, provided by Colorado Parks and Wildlife (CPW) and relative to the time of OGDP submission (prior to July 15, 2024), show that the proposed surface location is not within HPH. Extraction has submitted a site-specific Wildlife Protection Plan to evaluate wildlife resources present and propose BMPs that will avoid, minimize or mitigate any adverse impacts to wildlife, including conducting migratory bird surveys if construction activities begin within the recognized migratory bird breeding season (April 1 to August 31), and using berms and ditches, and sediment control logs to protect the nearby Community Ditch with an Ordinary High Water Mark (OHWM).

#### Water Usage (141 Comments, 33.98%)

These comments expressed concern regarding the amount of water that will be used to support the OGDPs Oil and Gas Activities. Extraction has committed to purchasing water for the drilling and completions of the wells through a private provider, as well as using approximately 161,000 bbls of recycled water.

#### Spills and Releases (123 Comments, 29.64%)

These comments expressed concerns regarding the impacts from spills and releases. 10 comments specifically mentioned soil contamination. Extraction has submitted a site-specific Fluid Leak Detection Plan, Stormwater Management Plan consistent with the requirements of Rule 1002.f, and Waste Management Plan consistent with the requirements of Rule 905.a.(4). These Plans include BMPs to avoid, minimize, and mitigate impacts from spills and release, including the use polyethylene liner during the drilling and completions, secondary containment for all chemical storage, remote shut in capabilities using a SCADA system, and Leak Detection and Repair (LDAR) program, and the use of berms and ditches, and sediment control logs.

#### Water Impacts (117 Comments, 28.19%)

These comments expressed concerns regarding water contamination (109 comments, 26.27%), groundwater (17 comments, 4.10%), and surface water/wetlands (6 comments, 1.45%). Extraction is required to identify and evaluate all potential impacts or potential contaminant migration pathways from the proposed oil and gas location to the nearest down gradient riparian corridors, wetlands, and surface waters of the state. Site-specific BMPs will be required to avoid, minimize or mitigate adverse impacts to identified water resources. Rule 411 defines protections to public water systems, including surface water intake buffers and protections. Per ECMC Rule 303.a.(5).B.iii., Operators will also evaluate and identify potential contaminant migration pathways downstream of the proposed location, providing baseline

conditions of any riparian corridor, wetland, or surface water identified.

At the time Extraction submits permits to drill individual wells, a casing and cementing plan addressing how groundwater will be isolated will be required, as outlined in Rule 308.b.(6). ECMC Rule 437 lists chemicals Operators are prohibited from using as additives in Hydraulic Fracturing Fluid, which includes Benzene. Operators are required to report Hydraulic Fracturing Additives used to the Chemical Disclosure Registry (fracfocus.org) per Rule 208.c.(2).

Extraction identified all surface water features within one-half mile of the proposed Draco location, and evaluated all potential impacts or potential contaminant migration pathways to the nearest down gradient riparian corridors, wetlands, and surface waters of the state. The Community Ditch that is approximately 100 feet from the Working Pad Surface (WPS) is upgradient, and the nearest downgradient Waters of the State and downgradient wetland is an emergent wetland 1,116 feet to the south of the proposed location. Site-specific BMPs will be implemented at the proposed Draco location, as mentioned above.

#### Hazard in Drilling Area (144 Comments, 34.70%)

These comments expressed concerns regarding impacts to geologic hazards (34 comment, 8.19%), mining obstacles/old mines in the area (41 comment, 9.88%), and proximity to other oil and gas development (121 comment, 29.16%). Per ECMC Rule 304.c.(21), if the operator identifies any Geologic Hazards pursuant to Rule 304.b.(7).I, the Operator will submit a Geologic Hazard plan describing proposed mitigation measures. There were no geologic hazards that were identified within a mile of the proposed Draco location, and therefore a Geologic Hazards Plan was not required, and not submitted. Many of the comments mentioned surface mines within the area, and potential impacts from the proposed wellbores. There is over a mile of vertical separation between the mines and the wellbores, effectively isolating the potential for impacts. Rule 408.w. Defines how inactive wells within 1500 feet can be isolated to prevent unanticipated migration of pressure from hydraulic fracturing.

Many comments expressed concerns about the impact of plugging and abandoning operations on nearby residences. Extraction has committed to plugging and abandoning 22 vertical wells in the area of the OGDP. The effects of plugging and abandoning a well are reviewed when a Form 6 Intent to Abandon form is submitted by the operator. Common Best Management Practices required for plugging wells near residences include: providing notice to residents, limiting operations to the daytime, emissions controls, and noise mitigation. Plugging and Abandoning wells has the additional benefit of eliminating methane emissions from unplugged wells.

#### Nuisance Impacts (103 Comments, 24.82%)

These comments expressed concerns regarding nuisance impacts, including Alternative Location Analysis (ALA)(3 comment, 0.72%), dust (2 comment, 0.48%), lights (2 comment, 0.48%), noise (92 comment, 22.17%), and traffic (90 comment, 21.69%). Because the proposed location is within 2,000 feet of 5 RBUs, Extraction was required to prepare a site-specific dust mitigation plan, light mitigation plan, noise mitigation plan, and odor mitigation plan. The proposed location meets one or more of the criteria listed in Rule 304.b.(2).B, so, an ALA was required. Rules for the analysis of alternate locations include identifying potential locations from which the target minerals can be obtained and providing an evaluation of the potential impacts of the alternative locations to public health, safety, welfare, the environment,

or wildlife resources.

Per ECMC Rule 427.b., operators will minimize fugitive dust caused by their operations, or dust originating from areas disturbed by their Oil and Gas Operations that becomes windborne. Extraction must apply dust suppressant, when applicable, and adhere to BMPs, for example constructing wind breaks and barriers, should they be necessary for compliance on each location.

Per ECMC Rule 424, Extraction will not only submit a light mitigation plan, but also comply with all lighting standards on location during all phases of construction and production, including, but not limited to, directing lighting downward below the horizontal plane of the center of the light source, obstructing light from going off site, and minimizing lighting with not needed using timers or motion sensors.

Per ECMC Rule 423, Extraction will have to comply with maximum permissible noise levels to protect public health, safety, and welfare, and describe methods to design acoustical mitigation measures to all locations. In addition, per ECMC Rule 423.b., an ambient noise survey will be completed to establish baseline conditions for noise levels on site.

According to Rule 304.c.(6)., and should Relevant Local Governments require it, Extraction will submit a transportation plan or equivalent traffic planning document. Extraction has submitted a Transportation Plan with their application. Traffic on City and County roads is not within the ECMC's jurisdiction.

### Cumulative and Long Term Impacts (90 Comments, 21.69%)

These comments expressed concerns regarding cumulative (79 comment, 19.04%) and long term (11 comment, 2.65%) impacts of oil and gas activity. ECMC staff continues to focus on cumulative impact data gathering with annual cumulative impacts reporting made available to the public for transparency. Rule 303.a.(5).B. states that the Operator will submit Cumulative Impacts Data Identification that provides quantitative and qualitative data to evaluate incremental adverse and beneficial contributions to cumulative impacts caused by Oil and Gas operations associated with the proposed OGDP, including and measures the Operator will take to avoid, minimize, or mitigate any adverse impacts. Because applications are reviewed according to the rules active on the date of their submission, delaying the hearing until after the Cumulative Impacts rulemaking would not change which rules this application is reviewed under.

#### Lack of Trust and Confidence in Drilling Plan and Operator (85 Comments, 20.48%)

These comments expressed concerns regarding a lack of trust and confidence in the 5 mile lateral drilling plan (69 comment, 16.63%) and in Extraction/Civitas as an operator (40 comment, 9.64%). As new technology emerges, operators look to developing minerals with the smallest impact to the surface. Although 17 of the horizontal wellbores are planned to be 5 miles in lateral length, the productive interval of these wells will be 3  $\frac{1}{2}$  miles in length, and Extraction will not be hydraulically fracturing the first mile of the lateral.

Any person in Colorado has the right to file a complaint with the Energy and Carbon Management Commission (ECMC) related to oil and gas operations within the state. Complaints can be submitted on the ECMC website, by email, or by phone. If the ECMC believes a rule violation has occurred, either based on a complaint or a routine site inspection,

Rule 523 outlines enforcement options. Generally, an operator is given notification of the violation and a time period to fix the violation. If the operator does not fix the violation, or the violation is a repeated offense, the ECMC can start the official process to seek penalties.

#### **Proposed Future Development (67 Comments, 16.14%)**

These comments expressed concerns regarding the planned Westerly community in the Town of Erie. If the community is built, all State and County setback requirements from the Oil and Gas location would apply. The Southern Land Company, the developer of the planned Westerly community, has filed a petition pursuant to Rule 507 to be an affected party. If granted, affected party status would give the Southern Land Company the ability to participate formally in the OGDP hearing for this location. Currently, the Westerly neighborhood is in the planning stages, and Extraction has been in communication with the Southern Land Company, as well as the Town of Erie, and has committed to continuing communication throughout the project.

#### Public Welfare (56 Comments, 13.49%)

These comments expressed concerns regarding impacts to overall well-being, specifically noting property values (29 comment, 6.99%), quality of life (32 comment, 7.71%), and visual/aesthetic impacts (4 comment, 0.96%). No government agency, including ECMC, has the power to dictate the value of a property.

In regards to visual/aesthetic impacts, and in compliance with ECMC Rule 425.a.(1), (2) & c., Extraction will orient Oil and Gas Facilities in a direction to reduce the contrast between the Oil and Gas Facilities and the surrounding landscape. Extraction will also paint permanent equipment with a uniform, non-contrasting, non-reflective color tone (similar to the Munsell Soil Color Coding System), and with colors matched to but slightly darker than the surrounding landscapes.

#### Risk to & Cost to Maintain Local Infrastructure (50 Comments, 12.05%)

These comments expressed concerns regarding the risk to and cost to maintain local infrastructure, due to the impacts of oil and gas activity. ECMC does not have jurisdiction over road use, this infrastructure is regulated at the city and county level. Extraction has been in communication with the Town of Erie and Weld County in regards to maintaining local road use and impacts of oil and gas activity.

#### Greenhouse Gas Emissions and Climate Change (40 Comments, 9.64%)

These comments expressed concerns regarding oil and gas activities emitting greenhouse gasses (23 comment, 5.54%) or contributing to climate change (36 comment, 8.67%). The Colorado Greenhouse Gas Pollution Reduction Roadmap 2.0 outlines Near Term Actions taken to reduce greenhouse gas emissions from the Oil and Gas industry. The Air Quality Control Commission rules regulate greenhouse gas emissions from oil and gas operations.

#### Community Outreach (35 Comments, 8.43%)

These comments expressed concerns regarding the community outreach efforts conducted within proximity to this proposed location. Per ECMC Rule 304.c.(20), should the proposed location be within 2,000 feet of an RBU, High Occupancy Building Unit, or School Facility within a Disproportionately Impacted Community (DIC), a consultation outreach, and engagement plan will be provided. Operators will provide notice to any and all of the above locations with information regarding public meetings and description of any measures being taken to directly

mitigate adverse impact to the DIC. This OGDP is not within a DIC, therefore, it does not have any additional notifications to make.

In Colorado, severed mineral rights, also known as severed estate, occur when the mineral estate and the surface estate of a parcel of land are owned by different parties. The imperial estate is a mineral interest in real property and the surface estate is an interest in real property that doesn't include the full mineral estate. Additionally, Operators are only required to contact parties within 2,000 feet and mineral owners. In the case of the Draco OGDP, the minerals in which the wells will be extracting from are not owned by the RBUs above them. Therefore, notification was not required.

Voters in Boulder County approved the extension of a moratorium (Ordinance 8253) on the acceptance and processing of applications for drilling permits on City of Boulder Open Space properties and for any city permits of Use Review of oil and gas extraction in the city. However, this moratorium was lifted in December of 2021 and replaced with comprehensive new restrictions for application review intended to protect the public health, safety and welfare and the environment. An oil and gas pollution tax was also implemented. In the case of the proposed Draco OGDP, the proposed surface location is within Weld County, and parts of the minerals that will be developed are under Boulder County.

#### **Induced Seismicity (27 Comments, 6.51%)**

These comments expressed concerns regarding potential seismic activities triggered by Oil and Gas Activities. In the experience of the ECMC, seismic activity has not been associated with oil and gas well drilling, well completions operations (e.g. hydraulic fracturing), or well production in Colorado. Though there have been reports of small seismic events in Weld County, those events were triggered by injection wells. In the case of the Draco OGDP, Extraction will not be utilizing injection wells at the proposed location. Rule 705.b. requires Operators to maintain general liability insurance coverage for property damage, bodily injury to third parties, and sudden or accidental pollution that requires Remediation, with no exclusion for claims arising from operator-caused seismicity.

#### General Opposition to Oil and Gas (22 Comments, 5.30%)

These comments expressed an overall general opposition to continued oil and gas activities in Colorado. Colorado law permits the development of oil and gas resources. Colorado's Oil and Gas Conservation Act authorizes and directs the ECMC to regulate the development and production of the natural resources of oil and gas in the state of Colorado in a manner that protects public health, safety, and welfare, including protection of the environment and wildlife resources. Specifically in regards to OGDPs, ECMC Rule 304 outlines the requirements operators must comply with when seeking approval of an OGDP that demonstrates their planned operations will be protective of public health, safety, and welfare, including protection of the environment and wildlife resources. ECMC Staff have reviewed the Draco OGDP application and have found that it satisfies the information requirements of ECMC Rule 304. Additionally, ECMC staff was included in pre-application consultations as well as consultations after the OGDP was submitted with local governments (Town of Erie and Weld County) and CDPHE to ensure their comments and concerns are sufficiently addressed in the Draco OGDP. As such, ECMC staff have advanced the Draco OGDP application to a hearing by the Commission, during which a final agency decision will be made.

#### Fire and Explosion (22 Comments, 5.30%)

These comments expressed concerns regarding fires and explosions. The ECMC's fire prevention and protection requirements are contained in Rule 611, which also requires operators to comply with all Division of Oil and Public Safety regulations. At the time the OGDP was submitted to the ECMC, Extraction needed to supply an Operations Safety Management Program and an Emergency Response Plan. Rule 602.j. requires operators to coordinate with the local emergency response agency on the emergency response plan.

## **Disproportionately Impacted Communities (1 Comments, 0.24%)**

These comments expressed concerns regarding disproportionately impacted communities (DIC) near the proposed Draco OGDP. There are no DICs within a mile of the proposed location, and no RBUs within a DIC within a mile of the proposed Draco location.

## **FORM** 2A

Rev 05/22

# **State of Colorado Energy & Carbon Management Commission**



**Document Number:** 

403550304

1120 Lincoln Street, Suite 801, Denver, Colorado 80203 Phone: (303) 894-2100 Fax: (303) 894-2109

#### **Oil and Gas Location Assessment**

This Oil and Gas Location Assessment is to be submitted to the ECMC for approval prior to any ground disturbance activity associated with oil and gas operations. Approval of this Oil and Gas Location Assessment will allow for the construction of the below specified Location; however, it does not supersede any land use rules applied by the local land use authority. Please see the ECMC website at

Date Received:

	01/17/2024				
Location ID:					
OGDP ID:					
piration Date:					
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X New Location	Refile	Amend Existing Location #		
If this Location assessme	nt is a component of a	in Oil and Gas Development	Plan (OGDP) applic	ation, enter the OGDP docket number(s).
Docket Number	OGDP ID	OGDP Name		
240100004				
If this Location assessme	nt is part of an approv	ed Oil and Gas Developmen	Plan, enter the OG	DP ID number(s).
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CONSULTATION				
This location is inc	luded in a Comprehen	sive Area Plan (CAP). CAP I	D#	
This Location or its	associated new acce	ss road, utility, or Pipeline co	rridor meets Rule 30	9.e.(2).A, B, or C.
This Location is wi	thin 2,640 feet of a GL	IDI or Type III Well per Rule	411.b.(4).	
This Location inclu	des a Rule 309.e.(2).E	variance request.		
This location include	des a Rule 309.f.(1).A.	ii. variance request.		
Operator			Contact In	formation
Operator Number:	10459		Name: Jeff	Annable
Name: EXTRACTION	OIL & GAS INC		Phone: (30	3) 312-8529
Address: 555 17TH S	TREET SUITE 3700		Fax: <u>(</u>	)
City: DENVER	State:	CO Zip: <u>80202</u>	email: janı	nable@civiresources.com
FINANCIAL ASSU	RANCE FOR TH	IIS LOCATION (checl	call that apply)	
X Plugging, Abandor	ment, and Reclamatio	n 20130028	,	
Centralized E&P W	aste Management Fa	cility		
Gas Gathering, Ga	s Processing, and Und	derground Gas Storage Facil	ities	
Surface Owner Pro	tection Bond.			
Federal Financial	Assurance			
	x, the Operator certifie t for one or more Wells		provide at least this a	amount of Financial Assurance to the
Amount of Federal	Financial Assurance \$	·		
LOCATION IDENT	TEICATION			

Number:

Pad

Name: Draco

rovide the local ference for this			he latitude	and longitu	de of a single poi	nt near the	center of the V	/orking Pad Su	urfoco oo o	
	Location	•		3	3 .			vorking r dd Ot	illace as a	
uarterQuarter:	NESE	Section:	21	Township:	1N Range	e: <u>68W</u>	Meridian:	6 Ground	d Elevation	: 522
Latitude: 4	0.033221		Longitude:	-105.0035	18					
GPS Quality Va	lue:	1.6	Type of	GPS Quality	Value: PDOP		Date of Me	easurement: 0	9/22/2023	_
RELATED R	EMOT	= 1 OCA.	TIONS							
				Fnter the	Form 2A docume	nt # only if	there is no esta	ahlished COGO	C Location	n ID#)
This propose			_			FORM 2A		151101104 0000	o Location	,
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					INFORMAT	ION				
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er § 34-60-106 oposed oil and			ving questi	ons pertain	to the "Relevant I	_ocal Gove	rnment approv	al of the siting	of the	
is proposed O quirements of	il and Gas § 24-65.1-	Location i	is in an are 3.	a designate	ed as one of State	interest an	d subject to the	e Ye	<u>S</u>	
es the Releva	nt Local C	Sovernmen	t regulate t	he siting of	Oil and Gas Loca	itions, with	respect to this	location?	Yes	
siting permit a	oplication	has been s	submitted to	the Releva	ant Local Govern	ment for thi	s proposed Oil	and Gas Loca	tion:	Yes
ite Relevant L	ocal Gove	rnment pei	rmit applica	ition submit	ted: 11/07/2	2023				
rrent status o	dispositio	on of the R	elevant Loc	cal Governn	nent permit applic	ation for thi	s proposed Oil	and Gas Loca	ition: Ap	prove
atus/dispositio	n date:	02/29/2	024							
Relevant Loca	l Governm	ant narmit								
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rovide the control il and Gas Local and Gas Local ontact Name: ontact Email:  PROXIMATION For every Proximated and the Type of Proximated and the Type of Proximated European South Part Sederal drilling Date submitted Eurrent status of Location:  Status/disposition of Federal agents	act information:  Jennifer  jteeters  E LOCA  mate Localir contact  mate Co  ERMIT  ag permit (  cor disposit  con Date:  cy permit	Teeters  @weld.gov  AL GOVE al Government information  unty  INFORI  or related second of the Fellowship in the Fellowsh	ERNMEI  Dent (PLG)  Mun  ERIE  MATION  Siting applications  Federal drill  Approved on	NT INFO associated icipality cation) has	Contact Phone:  RMATION with this propose  Contact Nan David Frank been submitted for related siting a	970-400-3 d Oil and G ne Co 303 or this propo	he local permit  3539  as Location, p  ntact Phone 3-926-2716  bsed Oil and G  for this proposition of the p	Contact Endfrank@erias Location:	ail eco.gov	0

041WOGLA23-0062	
ELEVANT LOCAL GOVERNMENT OR F	EDERAL PRE-APPLICATION CONSULTATION
	related to this proposed Oil and Gas Location that occurred prior to the onsultation Process occurred, attach a Consultation Summary.
a pre-application Formal Consultation Process occur	with the Relevant Local Government per Rule 301.f.(3)?
Date of local government consultation: 08/30/2023	3
a pre-application Formal Consultation Process occur	with the Federal land manager per Rule 301.f.(3)? No
Date of federal consultation:	
s an ALA that satisfies Rule 304.b.(2).C (or substantial eral or local government permit application process?	Ily equivalent information per Rule 304.e) developed during a  If yes, attach the ALA to the Form 2A.
A APPLICABILITY AND CRITERIA	
	related to this proposed Oil and Gas Location that occurred prior to the onsultation Process occurred, attach a Consultation Summary.
es the proposed Oil and Gas Location meet any of the	criteria listed in Rule 304.b.(2)B? Yes
ES, indicate by checking the box for every Rule 304.b. l.b.(2).B.i-x for full text of criteria.	(2).B criterion met by this proposed Location, and attach an ALA. See Rule
i. WPS < 2,000 feet from RBU/HOBU	vi.aa. WPS within a surface water supply area
ii. WPS < 2,000 feet from School/Child Care Center	vi.bb. WPS < 2,640 feet from Type III or GUDI well
iii. WPS < 1,500 feet from DOAA	vii. WPS within/immediately upgradient of wetland/riparian corridor
iv. WPS < 2,000 feet from jurisdictional boundary and PLG objects/requests ALA	d Viii. WPS within HPH and CPW did not waive
v. WPS within a Floodplain	ix. Operator using Surface bond
	x. WPS < 2,000 feet from RBU/HOBU/School within a DIC
ne proposed Oil and Gas Location within the exterior bects to the Location or requests an ALA? If YES, attac	ooundaries of the Southern Ute Indian Reservation, and the Tribe han ALA to the Form 2A.
erator requests the Director waive the ALA requireme	ent per Rule 304.b.(2).A.i:
vide an explanation for the waiver request, and attac	ch supporting information (if necessary).

# ALTERNATIVE LOCATIONS DASHBOARD

List every alternative location reviewed and included in the ALA. Provide a latitude and longitude for the approximate center of the alternative location, all Rule 304.b.(2).B Criteria met, if a variance would be required to permit the location, and a brief comment on the key points of the alternative location.

# 304.b.(2).B.i-x Criteria Met:

#	latitude	longitude	i	ii	iii	iv	v	vi	vii	viii	ix	х	Variance Required?	Comments
	40.046135	-105.004154	х						х					ALA#1 -28 RBUs,
	40.017826	-105.006558	х											ALA#2 - 236 RBUs
	40.021132	-105.022927							х					ALA#4 - 0 RBUs, no path for permitting through Town of Erie.
	40.033620	-105.030199	х	х					х					ALA#3 - 266 RBUs, 1 HOBU, 2 School Properties, 1 School Facility

SURFACE & N	MINER	AL OWNERS	HIP						
Surface Owner In	nfo:								
Name: Crestone Peak Resource Ho Phone:									
Address:	555 17	'th St		 Fax	:				
Address: Suite 3500 Email: surfaceland@civiresources.com									
City: Denver		State: CO	Zip: _	80202					
Surface Owner a	t this O	il and Gas Locati	on:	Fee S	State	Federal		] Indian	
Check only one:	ПТ	ne Operator/Appl	icant is	the surface owne	er.				
	X TI	ne Operator has	a signed	d Surface Use Ag	reeme	ent for this Loca	ition –	attach SUA.	
	SI	ırface owner owr	ns the m		his Lo			eath the Location, and the ted to an oil and gas lease -	-
	0		o use a	surface bond per				neath the Location, and the s to this Location – attach le	ase
Surface Owner p	rotectio	n Financial Assur	rance ty	pe: N/A		Sure	ty ID	Number:	
Mineral Owner be	eneath t	his Oil and Gas L	_ocation	: X Fee	Sta	ate	eral	Indian	
Minerals beneath	this Oi	l and Gas Location	on will b	e developed from	or pro	oduced to this (	Oil and	d Gas Location: No	
Lease description	n if nece	essary:							
SITE EQUIPM	ENT L	.IST							
Indicate the numbe	r and typ	pe of major equipm	ent com	oonents planned fo	r use o	n this Oil and Ga	s Loca	ation:	
Well	s 26	Oil Tanl	ks 0	Condensate Tanks	0	Water Tanks	0	Buried Produced Water Vaults	0
Drilling Pit		Production Pi	ts 0	Special Purpose Pits	0	Multi-Well Pits	0	— Modular Large Volume Tank	2
Pump Jack		Separato	rs 27	Injection Pumps	0	Heater-Treaters	0	Gas Compressors	4
Gas or Diesel Motor	rs 0	Electric Motor	rs 0	Electric Generators	0	Fuel Tanks	0	LACT Unit	0
Dehydrator Unit	s 0	Vapor Recovery Ur	nit 0	VOC Combustor	0	Flare	0	Enclosed Combustion Devices	1
Meter/Sales Buildin	g3	Pigging Station	on3		Vapor	Recovery Towers	0	_	
OTHER PERM	1ANEN	NT EQUIPMEN	NT						

Permanent Equipment Type	Number
Maintenance Vessel	1
Surge Vessel	2
Water Cooler	2
Water Pump Skid	3
Comm Tower	1
LP Scrubber	1
Instrument Air	1
Oil Pump Skid	5
Fuel Gas Scrubber	1

# OTHER TEMPORARY EQUIPMENT

Temporary Equipment Type	Number
Frac Tanks (Sand Blowdown)	2
Sand Cans	26

## GAS GATHERING COMMITMENT

Operator commits to connecting to a gathering system by the Commencement of Production Operations?

If the answer is NO, a Gas Capture Plan consistent with the requirements of Rule 903.e MUST be attached on the Plans tab.

### FLOWLINE DESCRIPTION

Per Rule 304.b.(6), provide a description of all onsite and off-location oil, gas, and/or water flowlines.

On-Location: Extraction will trench flowlines in one piping corridor that runs between the drill pad and the separator pad and be placed at 12" centers. These lines will most likely be 2" or 3" fusion bonded SCH160 steel pipe and have proper cathodic protection throughout the run. Extraction will then sweep up with a long radius that will tie off each line to the appropriate separator. All welds on these are 100% x-ray and hydro tested to the API and Manufactures specs for a class 1500 series flange.

#### **CULTURAL DISTANCE AND DIRECTION**

Provide the distance and direction to the nearest cultural feature as measured from the edge of the Working Pad Surface.

	<b>-</b>		<b>.</b>	(chec		Condition	ons Satisfied /):	
	Distance		Direction	604.b.		604.b.		604.b.
Building:	871	Feet	S	(1)	(2)	(3)	Details of Condition(s)	(4)
Residential Building Unit (RBU):	1011	Feet	E	X			5 RBUs within 2000' of WPS - Signed Consents attached	X
High Occupancy Building Unit(HOBU	) 4443	Feet	N					
Designated Outside Activity Area:	5280	Feet	N					
Public Road:	904	Feet	E					
Above Ground Utility:	946	Feet	E					
Railroad:	5280	Feet	N					
Property Line:	74	Feet	NW					
School Facility:	4443	Feet	NW					
Child Care Center:	5280	Feet	N					
Disproportionately Impacted (DI) Community:	5280	Feet	NE					
RBU, HOBU, or School Facility within a DI Community.	5280	Feet	E					

RULE 604.a.(2). EXCEPTION L	OCATION REC	QUEST				
Operator requests an Exception Location Request from Rule 604.a.(2) [well is less than 150 feet from a property line]. Exception Location Request Letter and Waiver signed by offset Surface Owner(s) must be attached.						
CULTURAL FEATURE INFORMATION REQUIRED BY RULE 304.b.(3).B.						
Provide the number of each Cultural for	eature identified w	ithin the following dist	tances, as meas	ured from the Working Pad Surface:		
	0-500 feet	501-1,000 feet	1,001-2,000 f	eet		
Building Units	0	0	5			
Residential Building Units	0	0	5			
High Occupancy Building Units	0	0	0			
School Properties		0	0			
School Facilities	0	0	0			
Designated Outside Activity Areas	0	0	0			
CONSTRUCTION						
Size of disturbed area during const acres:	ruction in	19.45				
Size of location after interim reclam	ation in acres: $\_$	5.24				
Estimated post-construction ground	l elevation: 522	<u>24                                    </u>				
DRILLING PROGRAM						
Will a closed-loop drilling system be	used? Yes					
Is H2S gas reasonably expected to	be encountered	l during drilling oper	rations at conce	entrations greater than		
or equal to 100 ppm? No If YE Will salt sections be encountered d	· ·	Orilling Operations P	lan.			
Will salt based (>15,000 ppm Cl) dr	illing fluids be us	sed? No				
Will oil based drilling fluids be used	? Yes					
DRILLING WASTE MANAGE	MENT PROG	3RAM				
Drilling Fluids Disposal: OFFSI	ГЕ	Drilling Fluids Dis	sposal Method:	Recycle/reuse		
Cutting Disposal: OFFSI	—— ГЕ	Cuttings Dis	sposal Method:	Commercial Disposal		
Other Disposal Description:						
Surface hole drilling fluids will be di and reused on each well and then t			cility. Synthetic	(Group III) drilling fluids will be recycled		
Beneficial reuse or land application	plan submitted?	?				
Reuse Facility ID:	or Document	: Number:				
Centralized E&P Waste Manageme	ent Facility ID, if	applicable:				
CURRENT LAND USE						
Current Land Use: check all t	hat apply per	Rule 304.b.(9).				
Crop Land: X Irrigated	Non-Irrigat	ted Conservati	ion Reserve Pr	ogram (CRP)		
Non-Crop Land: Rangeland	Forestry	Recreation	า 🗌 0	ther		
Subdivided: Industrial	Commerci	ial 🗌 Residentia	ıl			
Describe the current land use:						

Date Run: 8/16/2024 Doc [#403550304]

The land is currently used for irrigated crop/oil and gas.
Describe the Relevant Local Government's land use or zoning designation:
Weld County Zoning: AG - Agricultural
Describe any applicable Federal land use designation:
N/A
FINAL LAND USE
Final Land Use: check all that apply per Rule 304.b.(9).
Crop Land: X Irrigated Non-Irrigated Conservation Reserve Program (CRP)
Non-Crop Land: Rangeland Forestry Recreation Other
Subdivided: Industrial Commercial Residential
REFERENCE AREA INFORMATION
If Final Land Use includes Non-Crop Land (as checked above), the following information is required:
Describe landowner's designated final land use(s):
Reference Area Latitude: Reference Area Latitude:
Provide a list of plant communities and dominant vegetation found in the Reference Area.
< No row provided >
Noxious weeds present:No
SOILS
List all soil map units that occur within the maximum extent of the proposed Oil and Gas Location. Attach the National Resource Conservation Service (NRCS) report showing the "Map Unit Description" listing the typical vertical soil profile(s). This data is to be used when segregating topsoil.
The required information can be obtained from the NRCS website at https://www.nrcs.usda.gov/wps/portal/nrcs/surveylist/soils/survey/state/ or from the ECMC website GIS Online map page. Instructions are provided within the ECMC website help section.
NRCS Map Unit Name: 42 - Nunn Clay Loam, 1 to 3 % slopes
NRCS Map Unit Name: 83 - Wiley-Colby complex, 3 to 5% slopes
NRCS Map Unit Name:
GROUNDWATER AND WATER WELL INFORMATION
Provide the distance and direction, as measured from the Working Pad Surface, to the nearest:
water well: 1169 Feet S
Spring or Seep: 5280 Feet N
Estimated depth to shallowest groundwater that can be encountered at this Oil and Gas Location:  11 Feet
Basis for estimated depth to and description of shallowest groundwater occurrence:
A groundwater survey was performed by a third party.
SURFACE WATER AND WETLANDS
1116 Feet S

Date Run: 8/16/2024 Doc [#403550304]

Provide the distance and direction to the nearest downgradient surface Waters of the State, as defined
in the 100-Series Rules, measured from the Working Pad Surface:
If less than 2,640 feet, is the Waters of the State identified above within 15 stream miles upstream of a Public Water
System intake?No
Provide the distance and direction to the nearest downgradient wetland, measured from the Working
Pad Surface:1116 FeetSE
Provide a description of the nearest downgradient surface Waters of the State:
The nearest downgradient surface waters of the state is an emergent wetland on the other side of County Road 7. There is a small portion of feature #7 (Unnamed Tributary to Little Dry Creek) that no longer exists at the mapped location and is therefore not a surface water and was not included in the measurement.
If the proposed Oil and Gas Location is within a Rule 411.a Surface Water Supply Area buffer zone, select the buffer
zone type:
Public Water System Administrator - Contact Name Email
If the proposed Oil and Gas Location is within a Rule 411.b GUDI/Type III buffer zone, select the buffer zone type:
Public Water System Administrator - Contact Name Email
Is a U.S. Army Corps of Engineers Section 404 permit required for the proposed Oil and Gas Location, access road, or
associated pipeline corridor?No
If a U.S. Army Corps of Engineers Section 404 permit is required, provide the permit status, and permit number if available:
Is the Location within a Floodplain? No Floodplain Data Sources Reviewed (check all that apply):    X   Federal (FEMA)   State   County   Local     Other     Does this proposed Oil and Gas Location lie within a Sensitive Area for water resources, as defined in the 100-Series Rules? Yes
CONSULTATION, WAIVERS, AND EXCEPTIONS
When Rule 309.e.(2) Consultation must occur, check all that apply:
This location is included in a Wildlife Mitigation Plan
This Oil and Gas Location or associated new access road, utility, or pipeline corridor falls within federally designated critical habitat or an area with a known occurrence for a federal or Colorado threatened or endangered species. Provide description in Comments section of Submit tab.
This Oil and Gas Location or associated new access road, utility, or pipeline corridor falls within an existing conservation easement established wholly or partly for wildlife habitat. Provide description in Comments section of Submit tab.
When Rule 309.e.(3) Consultation is not required, check all that apply:
This Oil and Gas Location has been included in a previously approved, applicable Wildlife Protection Plan.
This Oil and Gas Location has been included in a previously approved, applicable Wildlife Mitigation Plan.
This Oil and Gas Location has been included in a previously approved, applicable conservation plan.
Pre-application Consultation:
A pre-application consultation with CPW, regarding this Oil and Gas Location, occurred on:

CPW Waivers and Exceptions (check all that apply and attach all CPW waivers to this Form 2A):
The applicant has obtained a Rule 304.b.(2).B.viii CPW waiver for the requirement to complete an ALA.
☐ The applicant has obtained a Rule 309.e.(2).G CPW waiver and consultation is not required.
The applicant has obtained a Rule 309.e.(5).D.i CPW waiver and is requesting an exception from Rule 1202.c. (1).R.
The applicant has obtained a Rule 309.e.(5).D.ii CPW waiver and is requesting an exception from Rule 1202.c. (1).S.
The applicant has obtained a Rule 309.e.(5).D.iii CPW waiver of Rule 1202.c.(1).T.
The applicant has obtained a Rule 309.e.(5).D.iv CPW waiver and is requesting an exception from Rule 1202.c.(1) in accordance with an approved CAP.
X The applicant has obtained a Rule 1202.a CPW waiver.
The applicant has obtained a Rule 1202.b CPW waiver.
In accordance with Rule 1203.a.(3), the applicant requests an exception from compensatory mitigation Rule(s):
HIGH PRIORITY HABITAT AND COMPENSATORY MITIGATION
This Oil and Gas Location, associated access roads, utility, or Pipeline corridor falls wholly or partially within the following High Priority Habitats (Note: dropdown options are abbreviated - see Rule 1202 for full rule text):
< No row provided >
The following questions are for Oil and Gas Locations that cause the density to exceed one Oil and Gas Location per square mile in Rule 1202.d High Priority Habitat:
Direct Impacts:
Is Compensatory Mitigation required per Rule 1203.a for this Oil and Gas Location?No
Is a Compensatory Mitigation Plan proposed to address direct impacts for this Oil and Gas Location? No
Have all Compensatory Mitigation Plans been approved for this  Yes  Location?
If not, what is the current status of each Plan?
Is a Compensatory Mitigation Fee proposed for this Oil and Gas Location? No
Direct impact habitat mitigation fee amount: \$
Indirect Impacts:
Is Compensatory Mitigation required per Rule 1203.d for this Oil and Gas Location?No
Is a Compensatory Mitigation Plan proposed to address indirect impacts for this Oil and Gas Location? No
Have all Compensatory Mitigation Plans been approved for thisYes Location?
If not, what is the current status of each Plan?
Is a Compensatory Mitigation Fee proposed for this Oil and Gas Location? No
Indirect impact habitat mitigation fee amount: \$
Operator Proposed Wildlife BMPs

No BMP
CPW Proposed Wildlife BMPs No BMP
AIR QUALITY MONITORING PROGRAM
Will the Operator install and administer an air quality monitoring program at this Location? Yes
Operator Proposed BMPs No BMP
CDPHE Proposed COAs OR BMPs No BMP
PLANS
Total Plans Uploaded: 15
(1) Emergency Spill Response Program consistent with the requirements of Rules 411.a.(4).B, 411.b.(5).B, & 602.j  (2) Noise Mitigation Plan consistent with the requirements of Rule 423.a  (3) Light Mitigation Plan consistent with the requirements of Rule 424.a  (4) Odor Mitigation Plan consistent with the requirements of Rule 426.a  (5) Dust Mitigation Plan consistent with the requirements of Rule 427.a  (6) Transportation Plan
(7) Operations Safety Management Program consistent with the requirements of Rule 602.d
X (8) Emergency Response Plan consistent with the requirements of Rule 602.j
(9) Flood Shut-In Plan consistent with the requirements of Rule 421.b.(1)
(10) Hydrogen Sulfide Drilling Operations Plan consistent with the requirements of Rule 612.d
X (11) Waste Management Plan consistent with the requirements of Rule 905.a.(4)
(12) Gas Capture Plan consistent with the requirements of Rule 903.e
X (13) Fluid Leak Detection Plan
X (14) Topsoil Protection Plan consistent with the requirements of Rule 1002.c
X (15) Stormwater Management Plan consistent with the requirements of Rule 1002.f
X (16) Interim Reclamation Plan consistent with the requirements of Rule 1003
X (17) Wildlife Plan consistent with the requirements of Rule 1201
X (18) Water Plan
X (19) Cumulative Impacts Plan
(20) Community Outreach Plan

(21) Geologic Hazard Plan							
VARIANCE REQUESTS							
Check all that apply:							
☐ This proposed Oil and Gas Location requires the approval of a Rule 502.a variance from ECMC Rule or Commission							
Order number:							
ALL exceptions and variances require attached Request Letter(s) waivers, certifications, SUAs).	). Refer to applicable rule for additional required attachments (e.g.						
RULE 304.d LESSER IMPACT AREA EXEMPTION REQUESTS							
Check the boxes below for all Exemptions being requested. Les requested exemptions.	ser Impact Area Exemption Request must be attached, and will include all						
304.b.(1). Local Government Siting Information	304.c.(1). Emergency Spill Response Program						
304.b.(2). Alternative Location Analysis	304.c.(2). Noise Mitigation Plan						
304.b.(3). Cultural Distances	304.c.(3). Light Mitigation Plan						
304.b.(4). Location Pictures	304.c.(4). Odor Mitigation Plan						
304.b.(5). Site Equipment List	304.c.(5). Dust Mitigation Plan						
304.b.(6). Flowline Descriptions	304.c.(6). Transportation Plan						
304.b.(7). Drawings	304.c.(7). Operations Safety Management Program						
304.b.(8). Geographic Information System (GIS) Data	304.c.(8). Emergency Response Plan						
304.b.(9). Land Use Description	304.c.(9). Flood Shut-In Plan						
304.b.(10). NRCS Map Unit Description	304.c.(10). Hydrogen Sulfide Drilling Operations Plan						
304.b.(11). Best Management Practices	304.c.(11). Waste Management Plan						
304.b.(12). Surface Owner Information	304.c.(12). Gas Capture Plan						
304.b.(13). Proximate Local Government	304.c.(13). Fluid Leak Detection Plan						
304.b.(14). Wetlands	304.c.(14). Topsoil Protection Plan						
304.b.(15). Schools and Child Care Centers	304.c.(15). Stormwater Management Plan						
	304.c.(16). Interim Reclamation Plan						
	304.c.(17). Wildlife Plan						
	304.c.(18). Water Plan						
	304.c.(19). Cumulative Impacts Plan						
	304.c.(20). Community Outreach Plan						
	304.c.(21). Geologic Hazard Plan						
OPERATOR COMMENTS AND SUBMITTAL							
Comments							

Operator certifies that the MLVTs will be designed and implemented consistent with the COGCC Policy on the Use of Modular Large Volume Tanks in Colorado. MLVT Design Package, certified and sealed by a licensed professional engineer, is available upon request. Manufacturer of MLVT: Hydrologistics Size and Volume Up to two (2) 157' diameter/ 84,000 BBLs Anticipated time frame 180 days Informed Consent Guide RBU 1 - Pablo Gonzalez (tenant), Gary Cleland RBU 2 - Josh Cleland RBU 3 - Gary Cleland RBU 4 - Tricia and David Hulstrom (One lives here, and one lives in the southern home outside the buffer to the NE) RBU 5 - Jan and Ricky Hulstrom RBU Northern most home outside buffer to the NE - Genell Hulstrom RBU Southern most home outside buffer to the NE - Tricia and David Hulstrom (One lives here, and one lives in the southern home outside the buffer to the NE) I hereby certify that the statements made in this form are, to the best of my knowledge, true, correct and complete. Signed: Date: 01/17/2024 Email: jannable@civiresources.com Print Name: Jeffrey Annable Title: Manager, Permitting Based on the information provided herein, this Oil and Gas Location Assessment complies with ECMC Rules, applicable orders, and SB 19-181 and is hereby approved. **Director of ECMC** Date: ECMC Approved: CONDITIONS OF APPROVAL, IF ANY LIST All representations, stipulations and conditions of approval stated in this Form 2A for this location shall constitute representations, stipulations and conditions of approval for any and all subsequent operations on the location unless this Form 2A is modified by Sundry Notice, Form 4 or an Amended Form 2A. **COA Type Description** 0 COA

# **Best Management Practices**

#### No BMP/COA Type

#### **Description**

1 Planning

Operator will properly maintain vehicles and equipment

Operator will use non-emitting pneumatic controllers

Operator will use electric drilling rigs if available, and will demonstrate best-effort if unable to utilize them

Operator will use Tier IV or equivalent engines, such as NG Tier II w/ battery assist, (or better) for hydraulic fracturing (dual-fuel engines are not considered equivalent)
Operator will use electric equipment and devices (e.g. vapor recovery units or VRUs, fans, etc.) to minimize combustion sources on site (if yes, operator will provide a list outlining which equipment and devices will be electrified)

Operator will use Tier IV or equivalent engines, such as NG Tier II w/ battery assist, (or better) for nonroad construction equipment (dual-fuel engines are not considered equivalent)

Operator will not store hydrocarbon liquids in permanent storage tanks on site (other than a maintenance tank possibly used for well unloading or other maintenance activities)

Operator will not store produced water in permanent storage tanks on site (other than a maintenance tank possibly used for well unloading or other maintenance activities) Operator will implement a "hybrid or modern" production flowback method (eliminates tanks by routing the oil, natural gas and water directly to permanent production equipment)

Operator will use pipelines to transport water used for hydraulic fracturing to location Operator will have adequate and committed pipeline takeaway capacity for all produced gas and oil and water

Operator will shut in the facility to reduce the need for flaring if the pipeline is unavailable

Operator will use lease automatic custody transfer (LACT) system to remove/reduce the need for truck loadout

Operator will use OGP Group III drilling fluid

Operator will cover trucks transporting drill cuttings

Operator will use a squeegee or other device to remove drilling fluids from pipes as they exit the wellbore

Operator will ensure that all drilling fluid is removed from pipes before storage Ozone mitigation on forecasted high ozone days: operator will eliminate use of VOC paints and solvents

Ozone mitigation on forecasted high ozone days: operator will minimize vehicle and engine idling

Ozone mitigation on forecasted high ozone days: operator will reduce truck traffic and worker traffic

Ozone mitigation on forecasted high ozone days: operator will postpone the refueling of vehicles

Ozone mitigation on forecasted high ozone days: operator will suspend or delay the use of non-essential fossil fuel powered ancillary equipment

Ozone mitigation on forecasted high ozone days: operator will reschedule nonessential operational activities such as pigging, well unloading and tank cleaning Ozone mitigation on forecasted high ozone days: Operator will postpone flowback if emissions cannot be adequately captured with a vapor recovery unit (VRU)

Operator will use Modular Large Volume Storage Tanks

Operator will not use fracturing fluids which contain PFAS compounds

Operator will contribute to nearby fire district(s) to support transition away from PFAS-containing foam through funding, buy-back program participation/promotion, etc.

Operator will coordinate with nearby fire district(s) to evaluate whether PFAS-free foam can provide the required performance for the specific hazard

If PFAS-containing foam is used at a location: operator will properly characterize the site to determine the level, nature and extent of contamination

If PFAS-containing foam is used at a location: operator will perform appropriate soil and water sampling to determine whether additional characterization is necessary and inform the need for and extent of interim or permanent remedial actions

If PFAS-containing foam is used at a location: operator will properly capture and dispose of PFAS-contaminated soil and fire and flush water

# 2 General Housekeeping AT MOVE-IN. RIG-UP AND REGULARLY DURING DRILLING AND COMPLETION PHASES, OPERATOR WILL ROUTINELY WALK AROUND THE OUTSIDE OF THE DISTURBANCE TO IDENTIFY AND REDUCE OBTRUSIVE LIGHTING FROM LEAVING THE SITE WHERE POSSIBLE. 2. IN THE EVENT THERE ARE VERIFIED COMPLAINTS FROM NEIGHBORS REGARDING OBTRUSIVE LIGHTING, OPERATOR IS COMMITTED TO ADJUST FIXTURES OR INSTALL SHIELDING ON OFFENDING FIXTURES TO MINIMIZE THE OBTRUSIVE LIGHTING WHERE POSSIBLE. IN THE EVENT THE OBTRUSIVE LIGHTING CANNOT BE REMEDIED DUE TO SAFETY CONCERNS, OPERATOR WILL WORK WITH THE VERIFIED COMPLAINANT TO FIND AN AMENABLE SOLUTION. 3. DURING DRILLING AND COMPLETION PHASES, TEMPORARY LIGHT PLANTS WILL BE PRESENT AND RELOCATED AS NEEDED FOR SAFE LIGHT LEVELS. OPERATOR WILL CONTINUE THE PERIMETER WALK AROUND TO IDENTIFY AND REDUCE OBTRUSIVE LIGHTING LEVELS AS POSSIBLE. 4. DURING DRILLING OPERATIONS, FIXED LIGHTS WILL BE RIG MOUNTED AND ANGLED DOWNWARD TO LIMIT LIGHT SPILLAGE FROM THE SITE. 5. DURING COMPLETION OPERATIONS. FIXED LIGHTS WILL BE MOUNTED TO THE INTERIOR OF THE SOUND WALL AND ANGLED DOWNWARD TO LIMIT LIGHT SPILLAGE FROM THE SITE. 6. PERMANENT (PRODUCTION PHASE) LIGHTING WILL NOT BE INSTALLED ON THE SITE. 3 General Housekeeping 1. Consistent with good materials and waste management practices, The Operator maintains records of material/waste source, transporter, and final disposition or disposal. These records are maintained under usual and customary practice and are made available upon request. See attached list of waste disposal facilities that The Operator has active waste disposal profiles with. Depending on operational considerations, the type of waste in question, and approved disposal profiles. The Operator may send waste to one or more approved facilities on a single, individual 2. The Operator minimizes the generation of waste by ensuring that material products are fully used for their intended purpose. If unused materials remain following an activity, contractors are required to take unused products with them for reuse at the next applicable project. Contractors are contractually required to comply with applicable material and waste management practices. 3. In the event of an unintended release of material by a contractor, The Operator requires the contractor to report the release, and to remediate impacts in accordance with applicable cleanup standards. The Operator tracks all contractor releases to closure by requiring formal documentation, supported by laboratory analysis demonstrating cleanup of site impacts, any required waste characterization, waste disposal approval, and manifests or load tickets tracking waste from source, through transport, to final disposal. 4. If there are unanticipated hazardous waste streams not listed in the attached Waste Streams Spreadsheet, the hazardous waste will be stored and disposed of in compliance with all rules and regulations applicable to that specific waste. 5. Produced water with no commercial value or reuse potential is typically disposed of via underground injection. In all instances produced water is disposed of at an offsite location(s) via properly permitted disposal facilities including but not limited to UIC

6. Soils impacted with produced fluids will be transported offsite for disposal at a disposal facility permitted to receive E&P waste. All incidents are reported in accordance with ECMC 900-Series Rules.

wells intended specifically for produced water disposal.

7. All drill cuttings generated during drilling operations are transported offsite with proper manifesting for disposal at facilities properly permitted to receive E&P waste. Drilling fluids will be stored on-site and recycled for use in future drilling operations.

8. All surface trash, debris, and material not intrinsic to the operation of the oil and gas facility shall be removed, stored in a roll off container or other trash bin, and disposed of at a commercial solid waste disposal location.`

#### 4 General Housekeeping

The drilling rig(s) that will be utilized to drill the wells to total depth will be powered by utility power.

If available, Extraction will employ two (2) drilling rigs at the location simultaneously, resulting in a reduction of the time required to drill all the proposed wells on location. Extraction will employ pipe cleaning procedures when removing drill string from the well and remove drill cuttings daily.

Extraction will utilize Group III drilling fluids.

Utilize closed-loop, pit-less fluid management system.

Extraction will utilize Tier IV or equivalent rated completion equipment. This helps to minimize the cumulative impacts to air resources that are associated with the use of internal combustion engines.

Sand is a major constituent in hydraulic fracturing operations. Sealed containers are used to store and transport sand on location ultimately reducing the likelihood of sand becoming airborne. Affectionately referred to as 'sandboxes', the use of these containers eliminates the traditional use of open-top sand hoppers and transportation via conveyor belt or similar methods. Worker and public exposure to silica dust has been drastically reduced through the use of sandboxes.

Operator will install an oil pipeline to the location prior to first production. Reducing air emissions associated with truck traffic and the transfer of oil from storage tanks to tanker trucks.

Operator will install a produced water pipeline to the location prior to first production. Reducing air emission associated with truck traffic and engine idling.

Operator will utilize compressed air pneumatics for all pneumatic actuation on location. Eliminating the use of natural gas vented to the atmosphere during valve actuation and associated processes.

Operator will utilize a pressurized maintenance vessel during maintenance operations. Eliminating gas that would otherwise be vented to the atmosphere during maintenance operations.

Operator will utilize a tankless design. Eliminating emissions associated with oil and water storage and processing tanks.

Operator will electrify the permanent production facilities.

Wells, facilities, and equipment will be equipped to be shut-in remotely.

Nuisance: relative to ambient levels, temporary increases in sound levels are expected during drilling and completion operations.

Mitigation: sound walls will be erected around the location prior to the commencement of the drilling phase and will remain until the completions phase is completed; these walls stand 32' tall and utilize acoustic fabric to aid in the attenuation of sound emanating from equipment on the location; a "quiet completions fleet" will be used for hydraulic fracturing.

Nuisance: during production operations, increases in sound levels are expected Mitigation: electrified facilities will be utilized to minimize noises originating from location during production operations.

Nuisance: since the drilling and completions phases occur 24-hours per day, lighting is required by regulation for worker safety during nighttime hours; illuminating the location may cast halos or shadows that are perceptible from a distance; headlights on vehicles may also be perceptible during the overnight hours when vehicles enter/exit location.

Mitigation: lights will be angled in a downward manner to limit the 'halo effect' from impacting nearby receptors; lights on location and those affixed to the sound walls be placed at reasonable heights to limit 'light spillage' off location; only those lights necessary to maintain a safe working environment as well as compliance with the applicable regulations will be used.

Nuisance: during production operations increases in light emanating from location are possible.

Mitigation: there will be no permanent lighting installed at this location.`

#### 5 Wildlife

There is one NHD-mapped canal ditch, Community Ditch, approximately 15 feet northwest of the Site. Emergent wetlands were delineated along the banks of the ditch. Stormwater and erosion control measures will be implemented to ensure these features are not impacted by operations, and a formal waiver for Rule 1202.a.(3) will be requested from CPW.

If a trench is left open for more than 5 consecutive days during pipeline construction, Extraction will install wildlife escape ramps at a minimum of one ramp per  $\frac{1}{4}$  mile of trench.

If construction or other earth-moving activities will begin within the recognized migratory bird breeding season between April 1 and August 31, Extraction will conduct migratory bird surveys no later than one week before construction is scheduled to start to identify potential presence of nesting MBTA species within the Site. Should any nests be identified at that time, Extraction will pursue additional surveys, nest monitoring and/or other species-specific best management practices as recommended by and in coordination with CPW.

Ensure all personnel and contractors are aware of and adhere to applicable wildlife protection measures and BMPs;

Personnel and contractors will not harm any wildlife observed on site and will maintain recommended buffer distances related to wildlife;

Personnel and contractors will report any wildlife concerns, including the discovery of injured or orphaned wildlife, to on-site management and applicable EHSR personnel; Consult CPW and/or other applicable agencies/personnel, upon the discovery of new wildlife constraints, as needed;

Use qualified third-party contractors for wildlife surveys, monitoring, and other consultation purposes; and Document any wildlife-related issues or changes.`

# 6 Storm Water/Erosion

Control

#### Sediment Trap

- o Sediment traps will be installed along the east side of the stockpile and south of the detention basin to allow sediment laden stormwater to settle out prior to migration offsite. The installation of sediment traps will mitigate sedimentation to nearby waterways.
- Stockpile Management
- o Topsoil will be stockpiled along the northeastern border of the pad, within the limit of disturbance. To mitigate topsoil loss and migration of soil offsite, the stockpile will undergo surface roughening, seeding, and mulching.
- Surface Roughening
- o Once topsoil segregation and stockpiling are complete, the stockpile surface will undergo surface roughening. A tracked vehicle will drive over the surface to imprint horizontal ridges, encourage sediment entrapment, improve infiltration, and reduce runoff velocity.
- Seeding
- o Once topsoil segregation, stockpiling, and surface roughening are complete, the stockpile will be seeded to mitigate erosion. Establishing vegetative cover will help to stabilize the soil, reduce wind and water erosion, minimize rill erosion, and reduce overall surface runoff. The stockpile will be regularly monitored for noxious weed growth. Re-seeding will occur as necessary, over the course of active construction in order to achieve wide spread uniform vegetative cover.
- Mulching
- o Post seeding: a layer of straw or hay mulch will be installed via crimping along the stockpile in order to promote seed germination and further stabilization of the soil. Mulching helps to mitigate the impacts of rainfall and increase soil moisture retention. Mulching will be monitored and re-applied as necessary until vegetative growth is established.`

#### 7 Storm Water/Erosion Control

Berms are usually appropriate for drainage basins smaller than five acres, but with modifications they can be capable of servicing areas as large as ten acres. With regular maintenance, the life span of earthen berms can last throughout the life of a project. Berms can used at, but are not limited to, the following applications:

- Along the outside shoulder of an in-sloped road to ensure runoff from the roadway drains inward and to protect the fill slope from continual disturbance during road blading and maintaining;
- Up slope of cut or fill slopes to divert flows away from disturbed areas;
- Down slope of cut or fill slopes to divert on-site runoff into a stabilized outlet or sediment trapping device;
- Along the outside shoulder of a road to provide vehicle safety or;
- Secondary containment around pollutant sources.

Culverts are ideal on roads with grades of less than 15%. For grades over 15%, it is difficult to slow down the water or remove it from road surface rapidly. On such steep grades, it is best to use frequently spaced relief culverts and drainage crossing culverts, with armored ditches (see RIPRAP [R]). Culverts may be used:

- As drainage crossing culverts in streams and gullies to allow normal drainage to flow under pathways and roads;
- As ditch relief culverts to periodically relieve the inside ditch line flow by piping water to the opposite side of the road where the flow can be dispersed away from the roadway;
- Culverts placed in natural drainages may be utilized for ditch relief.

  Ditch and berms can be designed for temporary or permanent use. Regardless of timeframe, a ditch and berm should be sufficiently constructed throughout to minimize
- the potential for failure. Ditch and berms may be used for, but are not limited to:
   The up slope of cut or fill slopes to convey or divert flows away from disturbed areas;
- The down slope of cut or fill slopes to divert on-site runoff to a stabilized outlet or sediment trapping device;
- At the outer edge of a location to ensure that runoff remains on the pad and is diverted to a designated water collection system, such as a sediment trap, pond, etc. (if applicable):
- Where runoff from higher areas has potential for causing erosions, or interfering with, or preventing the establishment of vegetation on lower areas;
- Where the length of slopes need to be reduced so soil loss will be kept to a minimum;
- At the perimeter of a site or disturbed area.

Mulching is often used after (or in combination with) seeding to help aid in the establishment of vegetation. Hydraulic application of mulch is often used in steep areas (up to 1:1) where regular mulching is difficult because of environmental constraints. Mulch matting, with net or anchoring to hold it in place, can also be used on steep slopes or in critical areas such as waterways. Mulch can last for one to two years and is most effective when used on an area less than two acres in size. Riprap can be used for areas subject to erosion or weathering, particularly where conditions prohibit the establishment of re-vegetation or where flow velocities exceed 5 feet per second.

Riprap can be used in, but is not limited to:

- · Cut and fill slopes;
- · Channel side slopes and/or bottoms;
- Inlets and outlets to culverts, slope drains, and sediment traps; and
- · Roadside ditches.

Sediment ponds are usually used for drainage areas greater than 2 acres. They can be temporary or permanent. Sediment ponds designed to be used for up to 3 years are usually described as temporary. Those designed for longer service are considered permanent. Temporary sediment basins can be converted into permanent stormwater runoff management ponds, but they must meet all regulatory requirements for wet ponds.

Sediment traps are generally temporary control measures used at the outlets of stormwater diversion structures, channels, slope drains, construction site entrance wash racks, or any other runoff conveyance that discharges waters containing erosion sediment and debris. Sediment traps should be used for drainage areas of five acres or less. Sediment traps shall remain in place until the upstream disturbed area is stabilized. Traps may be located in a series to

accommodate larger drainage areas and allow for backup control in case one trap fails.`

### 8 Material Handling and Spill 1. During drilling, completion, and production operations, regular Auditory, Visual, and Prevention Olfactory Monitoring (AVO) inspections are performed on equipment containing hydrocarbons, fluids, or associated chemicals. AVO inspections include taking the time to look, smell and listen for leaks. 2. Operator will install a polyethylene liner across portions of the location as an isolation barrier. The drilling rig and associated equipment (including fluid storage areas) are placed atop the liner. 3. Operator will install a polyethylene liner across portions of the location as an isolation barrier. The completion fleet and associated equipment (including fluid storage areas) are placed atop the liner. 4. Routine SPCC inspections will be conducted and documented pursuant U.S. EPA requirements. The location will be equipped with a SCADA system that allows for remote monitoring and shut-in capabilities. 5. Operator has developed a robust Leak Detection and Repair (LDAR) program, which utilizes Forward Looking Infrared (FLIR®) cameras to identify and fix leaks. These inspections will begin during the drilling phase and continue throughout the life of the Oil & Gas Location. 9 Dust control 1. On Location, Dust suppression during periods of continuous operations will be accomplished by the application of water to the well pad and exposed earthen surfaces to reduce the transportability of dust when atmospheric conditions are conducive to sustained winds and/or periodic gusts. All dust suppression efforts will consist of only freshwater unless otherwise requested and approved as applicable. 2. To minimize sand-related dust emissions, the Operator will be utilizing containerized box technology for sand transport, storage and use during the completions phase. These sand containers (or "sand boxes") are sealed containers that protect the sand from exposure to wind and prevent dust generation. 3. Operator will post an access road speed limit not to exceed 20 miles per hour to minimize fugitive dust emissions from vehicle traffic traveling on the access road. 4. Operator will perform regular inspections and road maintenance to ensure the integrity of the access road and associated features is maintained throughout the life of this project. Maintenance consists of re-compacting the road base/recycled asphalt mix on an as-needed basis. 5. Operator will install and maintain vehicle tracking controls (i.e., coarse aggregate, a tracking pad, paved apron, or cattle guard) to further reduce and remove loose mud and dirt on construction equipment and vehicles servicing location.` Idling Equipment – While idling engine/equipment, maintain at the lowest frequency 10 Noise mitigation possible, as well as, in a position/location that will prevent sound from carrying to nearby residents. Unnecessary Sounds – Unnecessary sounds such as honking the horn, revving vehicle engines, loud music, and unwarranted metal hammering/banging are all examples of sound that can create nuisance; failure to eliminate unnecessary sound from location will be subject to an internal compliance assessment if reported by a landowner. The construction phase is scheduled to last, at this time, approximately 22 weeks. A sound barrier (minimum rating of STC-30) will be installed on all sides of the pad site. This sound barrier will be 32-feet tall and remain onsite through Completions operations. At the time of this NMP, two rigs will be used simultaneously, Patterson 572 and Patterson 345, to drill the wells on the Draco location. These rigs will be powered by utility power and will be designed and equipped with sound mitigating equipment including devices to minimize squeaking from the draw works brakes. The drill phase is scheduled to last, at this time, for approximately 18 weeks. A quiet frac fleet will be used during the completion phase. The completions phase is scheduled, at this time, to last for approximately 23 weeks. Flow-back is scheduled to last, at this time, approximately 4 weeks. Production is anticipated to last, at this time, approximately 30 years. At the commencement of production, if sound levels exceed the allowables set forth above, Extraction will mitigate production equipment, as necessary, to maintain compliance on the Draco location.`

#### 11 Odor mitigation

- 1. Operator will use a filtration system and additives in the drilling and fracturing fluids that minimize odors.
- 2.Operator shall utilize a closed-loop, pit-less mud system for managing drilling fluids.

  3.Operator shall employ the use of drilling fluids with low to negligible aromatic content (IOGP GroupIII) during drilling operations after the surface casing is set and freshwater aquifers are protected.
- 4. Operator shall remove drill cuttings daily and as soon as waste containers are full. 5. Operator shall employ pipe cleaning procedures when removing drill pipe from the hole; these procedures may include "wiping" the pipe before racking it in the derrick. 6. If a justified complaint is received, Operator will increase concentration of odormitigating additives in mud system.
- 7. Operator will utilize compressed air pneumatics.
- 8. Operator will utilize a pressurized maintenance vessel system.
- 9. Operator will install a tankless facility.
- 10. Operator will utilize utility powered facilities.

#### 12 Interim Reclamation

During interim reclamation, topsoil stockpiles will be compacted (i.e. "track-walked"), re-seeded and re-vegetated. Straw wattles may be placed around the perimeter of temporary and permanent stockpiles to control erosion and minimize sediment transport.

Permanent seeding involves planting seed to re-establish a vegetative cover in disturbed areas that will be inactive for an extended period. Seeding establishes vegetation that reduces erosion and sediment displacement by stabilizing disturbed areas in a manner that is economical, adaptable to site conditions, and allows the selection of the most appropriate plant material. Seeding also absorbs the impact of raindrops, reduces the velocity of runoff, reduces runoff volumes by increasing water permeation into the soil, binds soil with roots, protects soil from wind, improves wildlife habitat, and enhances natural beauty. During both the interim and final reclamation phases, permanent seeding will be applied to all topsoil stockpiles, detention basins, and

reclaimed areas.

Vehicle tracking control provides a stabilized construction site access point that helps remove sediment from vehicle tires exiting the site onto paved public roads. These devices may be constructed of rock, a proprietary portable tracking pad, or accomplished using cattle guards. Vehicle tracking control will be determined on site and implemented should it be determined necessary.

A berm is a mound of compacted soil constructed with a specified width at the top and side slopes graded to a specified slope. Berms may be constructed from either excavated topsoil or subsoil. Berms may be used to collect and direct on-site stormwater to sediment traps and outlets, store on-site stormwater, and deflect/redirect off-site runoff around the disturbance area. During the production phase, a continuous berm will be constructed downgradient of the working pad surface directing on-site stormwater towards the detention basin.

During the production phase, stormwater from the well pad and production facility will drain to the stormwater detention basin located southeast of the well pad. The outlet, utilized during both the construction and production phase, will consist of a 10-inch diameter high-density polyethylene (HDPE) pipe with an orifice cap to control release rates. Anti-seep collars should be used to prevent seepage through the berm and outlet slopes should be protected using geotextile fabric or riprap in order to prevent erosion along the embankment.

Two culvert locations will be required to ensure proper on-site and off-site drainage. One 12-inch corrugated metal pipe (CMP) culvert will convey on-site and off-site runoff from west, south, and east of the pad to the south under an existing access road during both the construction and production phase. Two 18-inch CMP culverts will serve as approach culverts to County Road 7 conveying off-site runoff from north and east of the project area to the south under the access road during both the construction and production phase.

This site will have riprap aprons located at the inlet and outlet of each culvert and the pipe outlet for the stormwater detention basin.

Construction sequencing or scheduling refers to a specified work schedule that coordinates the timing of land disturbing activities and the installation of erosion and sediment control practices. Construction activities will be sequenced to minimize the duration of surface disturbance and soil exposure. Soil amendment and seedbed preparation activities will be scheduled as soon as feasible following grading and leveling. The need for additional erosion and sediment control measures will be

evaluated during construction.

Good housekeeping practices will be implemented to prevent sediment, trash, and toxic or hazardous substances from entering surface waters or impacting soils. Good housekeeping practices include routine inspections, regular cleaning, site and equipment organization and maintenance, daily debris and construction waste management, appropriate chemical storage and contained fueling operations, and spill response kits maintained on-site.

The operations team routinely monitors sedimentation, access road condition, vegetation health, and several other safety and maintenance items to ensure the site is in workable and drainable order. Routine site maintenance and upkeep typically includes repairs of access roads, ditches, stockpiles and berms, cleaning and removal of sediment and debris from ditches, sediment traps, and detention basin outlets, as well as vegetation

monitoring and maintenance in accordance with manufacturer guidelines. In addition to monitoring during regular operations, a formal monitoring plan has been developed for the project site. During the drilling and completions phase, the site will

		be inspected a minimum of every 14 calendar days as well as following rain or snowmelt events that are able to cause surface erosion. During the interim reclamation phase, site inspections will occur at a minimum of every 30 calendar days until the site is fully stabilized. Once the site is stabilized and has achieved interim reclamation standards, inspections will occur annually.`						
Total:	otal: 12 comment(s)							

	ATTACHMENT LIST				
Att Doc Num	tt Doc Num Name				
2473685	CDPHE CONSULTATION				
2473686	CDPHE CONSULTATION				
2473687	OTHER				
403550304	FORM 2A SUBMITTED				
403631034	LGD CONSULTATION				
403639239	CPW WAIVER				
403650986	ALA DATASHEET				
403651102	INFORMED CONSENT LETTER				
403651104	INFORMED CONSENT LETTER				
403651106	INFORMED CONSENT LETTER				
403651109	INFORMED CONSENT LETTER				
403651114	INFORMED CONSENT LETTER				
403651125	INFORMED CONSENT LETTER				
403651136	SURFACE AGRMT/SURETY				
403651159	NRCS MAP UNIT DESC				
403651194	SURFACE PLAN				
403651217	OTHER				
403657917	ALA NARRATIVE SUMMARY				
403657918	WILDLIFE HABITAT DRAWING				
403657919	ACCESS ROAD MAP				
403657922	CULTURAL FEATURES MAP				
403657923	DIRECTIONAL WELL PLAT				
403657924	GEOLOGIC HAZARD MAP				
403657925	LAYOUT DRAWING				
403657928	PRELIMINARY PROCESS FLOW DIAGRAMS				
403657929	RELATED LOCATION AND FLOWLINE MAP				
403657931	LOCATION PICTURES				
403657967	LOCATION AND WORKING PAD GIS SHP				
403777182	LOCAL/FED FINAL PERMIT DECISION				
403783436	HYDROLOGY MAP				
403783438	LOCATION DRAWING				
403827476	CORRESPONDENCE				

Total Attach: 32 Files

# **General Comments**

User Group	Comment	<b>Comment Date</b>
OGLA	The Director has determined that the OGDP application that this Form is a component of meets all requirements of Rule 306.a. The Director's Recommendation has been attached to the Form 2A.	08/16/2024
OGLA	With operator concurrence, the following has been updated: Waste Management Plan. Water Plan. Cumulative Impacts Plan. Water recycling plan added.	08/11/2024
OGLA	Added CDPHE BMPs.	08/11/2024
OGLA	LGD Comment added at the request of Weld County.	08/11/2024

Date Run: 8/16/2024 Doc [#403550304]

LGD	The Weld County Oil and Gas Energy Department (OGED) submits the following comments:	08/11/2024
	Extraction Oil and Gas, Inc (Extraction) has completed the 1041 WOGLA permit process. Case number 1041WOGLA23-0062 has been assigned to the Draco Pad. All files associated with the processing and review of this permit are accessible through the Weld County E-Permit Center at https://aca-prod.accela.com/WELD/. If there are any questions relating to the ability to access these files, please call the OGED office at 970-400-3580. The Extraction Draco Pad was reviewed and processed under Weld County Code, ORD2021-17.	
	A pre-application meeting was held prior to application submittal on August 30, 2023. Invitees included Extraction, Colorado Energy & Carbon Management Commission (ECMC), Colorado Parks and Wildlife (CPW), Bureau of Land Management (BLM), Colorado Department of Public Health and Environment (CDPHE), Town of Erie, Boulder County, the Weld County Oil and Gas Energy Department (OGED Staff), and representatives of other Weld County departments (Weld County Staff). Boulder County, CDPHE and BLM were not in attendance for the meeting but were on the distribution list of the pre-application meeting minutes.	
	OGED received the initial 1041 WOGLA Application on November 7, 2023. The submitted Application was discussed with the Applicant to clarify and enhance certain items, and the final Application was deemed complete on December 21, 2023. The application submitted is compliant with all requirements of Section 21-5-320 of the Weld County Code. Weld County sent referrals to various parties on December 22, 2023. The Town of Erie responded with advisory comments on January 19, 2024. ECMC responded with advisory comments on January 3, 2024. CPW responded with no concerns on January 16, 2024. CDPHE responded with advisory comments on December 27, 2023. St. Vrain Valley RE-1 (J) School District responded with advisory comments on January 19, 2024. Community Ditch/Farmers Reservoir and Irrigation Company (FRCO) responded with advisory	
	comments on January 22, 2024. Colorado Geologic Society responded with advisory comments on February 14, 2024.  OGED did not receive any Applications for Intervention. Weld County did not receive any comments from the notice parties within the 1041WOGLA Zone.  Weld County had five public interactions through email all being residents or businesses within the Town of Erie. None of these five (5) parties owned a BU within the 1041WOGLA zone. All five (5) of these public comments were made part of the record.  The 1041 WOGLA Hearing was held on February 29, 2024.	
	The Hearing Officer considered testimony at the hearing and subsequently approved 1041WOGLA23-0062.  The final order was recorded with the Weld County Clerk Recorder on March 14, 2024, reception number 4949300, and was noticed in the Greeley Tribune on March 16, 2024. Approval and publication of the final order creates a vested property right pursuant to Article 68 of Title 24, C.R.S.  The approved Weld County 1041 WOGLA Permit, and Extraction's commitment to best	
	management practices outlined in the application, will protect the health, safety, security and general welfare of the present and future residents of Weld County, while also protecting both the environment and wildlife  The approved permit is valid for three (3) years – construction must commence within that timeframe, or an extension must be requested and approved, or the permit will expire.  Due to the fact that Extraction has completed the 1041 WOGLA Application process, and that a final order has been issued, approved, recorded and legally published, Weld County has no additional concerns with the pending ECMC permit, and would recommend approval.	
OGLA	The Director has determined this OGDP application is complete. Form pushed to IN PROCESS.	06/18/2024
OGLA	The Conditions of Approval (COA) and Best Management Practices (BMPs) on the Form 2A and the Final Order are the final enforceable permit conditions for this Oil and Gas Location. Any plan or attachment that contains information or language that is contrary to or less protective than ECMC rules or the COAs and BMPs on the Form 2A or Final Order does not relieve the operator from compliance with the applied COAs, BMPs or any ECMC rules.	06/18/2024

OGLA	Returned to DRAFT for the following reasons:  Datafield corrections.	04/08/2024
	Datafield corrections.	
	Plan and Attachment corrections.	
Total: 8 comme	nt(s)	
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# **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
are low. However, there are no events. Can you comment on v	at if a fracking operation is done properly, then environmental impacts onzero risks for water contamination or problems caused from seismic what the repercussions are to the drilling/extraction company(ies) in the benalties are in place to incentivize them to execute properly?	07/07/2024
want to know what is being do compounds (VOCs), noise, an do we have that other wells in that was plugged and abandor only to learn recently that becaunchecked going forward if any	od directly in the path of the proposed fracking from the Draco pad, I ne to ensure that we won't be impacted at all by volatile organic d traffic along Erie Parkway and CR 5/6/7? Likewise, what assurances our neighborhood won't have issues as it is, we have a leaking well ned years ago and it's taken over four years to finally have it addressed, ause the original drilling company is no longer in business, it could go ything else occurs. Who is responsible if it leaks methane again as a small children that I hoped I would see grow up in our home and I have th and well being.	07/10/2024
County because most of the tir less than 200' from Young 23-By the time the lines get to tho wells of that length from which best, about 150'. The risk of the minimal. Exposure to those gar decrease and given its current	I other environmentally related illnesses. I moved to eastern Boulder me the air here helps me to feel better. One of the planned lines is to be 14D and Young 5-23. My house is about 1,000' from those two wells. se wells, they are over 4 miles from the wellhead. I believe there are no to get data, but at 3 miles, horizontal uncertainty appears to be, at ose wells being disturbed and creating leaks of toxic gasses is not sses at such a short distance would mean my health would surely state, it might not rebound. I cannot fathom how approving a nonneath populated areas can even be considered.	07/10/2024
in Erie, I was shocked to learn wells. Air Quality/Environmenta multiple independent public he health studies have cited that t including asthma, preterm birth. This is an enormous pad in a hard community are of great concer it's difficult to keep track and killarge and in a highly populated. Additionally, Erie Parkway is a communities that are directly of	Iready congested enough, the additional traffic will adversely impact the	07/10/2024
last fall from a well that had lead contaminated soil to be remove have suffered irreversible lung can be attributed to this expositions consequences that we have year in Erie is even being considered the air and soil, and impacting wells eventually leak; it's just a directly underneath a significant	20 years. We live in a neighborhood that experienced a "historic leak" aked toxins into the soil, resulting in 87 cubic years or 1,000 tons of ed. Not to mention the impact that such a leak had on the air quality. I damage and my daughter has asthma, which doctors are convinced ure. Even Erie's own O&G POC has stated that such a spill will have et to foresee. So, it boggles the mind that such a massive undertaking ed when the town is grappling with old wells that are leaking, damaging the health of its residents. Have they not learned their lesson? ALL a matter of when and how much. This will be a ticking time bomb resting int portion of Erie's population, and no one has a problem with this? I do negly innocuous wells can cause serious life-threatening situations for et lives, not profits.	07/11/2024

6	Colorado is already failing EPA standards for air quality. If the COGCC is supposed to balance health with business, it's irresponsible to continue adding more fracking operations that negatively impact air quality. The people who live around this proposed well site would like to breathe clean air. Adding another fracking operation near homes is not responsible.	07/11/2024
7	There are many issues with this proposed project. I am an Erie resident as well, having moved in about 3 years ago, and never imagined this kind of thing would be approved in an area where there are already air quality issues, historical spills, and existing wells that need attention to prevent further impact to the community. The proposed horizontal wellbores are longer than anything done beforethis is unproven technology that should be tried in an unpopulated area first! The extent of this proposal could be getting national attention (not positive), shining a negative light on our beloved community once this project becomes more well known. We moved to Colorado and Boulder County for many reasons, among them the appearance of stringent environmental regulation that would protect our small kids when they soak up the beautiful outdoors. Instead, they could be playing in contaminated soil and water, and breathing unsafe air, if this project is approved. Geophysical impact information is sorely lacking as well. Put a stop to this, please!	07/11/2024
8	As a resident of Erie with my family I am shocked to learn that this will be happening in our community. There is evidence and research that shows the health effects that fracking can cause. How can you continue with this knowing how every individuals health will be affected.	07/11/2024
9	Due to the density of oil and gas activity in the southern part of Weld county, the disproportionate impacts to the residents, environment, and wildlife, the non-alignment of climate goals, and the non-attainment status of the area, there is no chance in Hades that this permit is justifiable.	07/11/2024
10	My family is in the process of closing on a house in Erie which is located in an area that would be impacted by one of the proposed horizontal Draco wells. There are a number of plugged and abandoned as well as shut-in wells in the neighborhood. We are fearful that the casing of these wells may not withstand the pressure of the Draco drilling and fracking operations since this has been observed repeatedly in similar operations. We fear this could result in methane leaks and worry about the impact that would have on our two small children. Please do not allow the Draco Pad proposal to pass so that thousands of families like ours that are located in the impact area aren't negatively affected.	07/11/2024
11	The ECMC mission statement on your site:	07/11/2024
	To regulate the development and production of oil and gas, deep geothermal resources, the capture and sequestration of carbon, and the underground storage of natural gas in a manner that protects public health, safety, welfare, the environment and wildlife resources.	
	It's the last section I'd like to reference, the protection of public health, safety, welfare, the environment and resources. It would seem to me another - in this case one of a kind - massive fracking operation in the vicinity of neighborhoods and schools, not to mention the 5 miles west into Boulder county the fracking pipes will be bored (where again this operation will go directly under neighborhoods, school, and through previously bored wells) would not be in the best interest of the public, our health and safety, or our welfare. Don't enough of the PA wells already leak posing threats that we don't need to test out if the incredible pressure of fracking will jeopardize any of the previously fracked wells?	
	Further, in what world is this fracking operation not hurting our environment - the last part of the ECMC mission to protect. The estimated usage of water is half a billion gallons and from what I understand that is almost always an under estimated usage according to previous drills. Is the waste water recyclable? No. From O&G's own admission, it's because the technology doesn't exist to recycle it. Maybe instead of a fracking operation that wastes 500 million gallons of water, we should invest that money in how to clean it and make it usable again for a variety of purposes.	
	Also, where does that water go? It doesn't just disappear. Much like our Erie landfill, the water must go somewhere. Injecting it into the ground doesn't seem safe for our ground water in the long run.	
	Let's ignore the fact that this operation has been designed to circumvent county lines so that oil/gas can be extracted from Boulder county where this project would t have seen the light of day. How about we make a stand and tell this company that this project does not benefit in any way the residents of Erie, Broomfield, Boulder County, et al. It doesn't benefit our environment or natural resources. Really, it doesn't benefit much of anyone except the O&G companies who set this plan in motion.	
	You - the ECMC - are the people we count on to protect us. Please take the appropriate action to do so.	

Thank you.	
The Draco Pad is a slap in the face to the residents currently living above the proposed drilling area. While I can appreciate the marvel of engineering the five miles of horizontal drilling 1.5 miles more than the previous longest lateral demonstrates, I do not want a marvel of engineering taking place directly below my house. Extraction Oil and Gas acknowledges risk with use of phrases such as "to the extent possible" but with the extraordinarily long laterals, multiple decommissioned wells in the area, and hundreds of residents living above the drilling, Extraction is piling multiple risk factors on top of one another to unacceptable levels.  In addition, as a resident of the Town of Erie and Boulder County, I can't help but get the feeling that I and my neighbors are being thrown into the middle of a petty feud between Boulder County and Extraction Oil and Gas. In November, 2022 Extraction lost a long court battle with Boulder County to develop the Blue Paintbrush project in unincorporated Boulder & Weld counties, almost directly north of the current proposed plan and tapping into the same oil sources. I can only assume this new Draco Pad plan was proposed underneath the town of Erie specifically to weaken Boulder County's mineral rights legal ownership argument by throwing Erie and its residents into the mix, despite the fact that the majority of residents affected live in Boulder County and voted on its policies and commissioners. If Extraction Oil and Gas cannot successfully tap oil beneath Boulder County without putting hundreds	07/12/202
of residents at risk to take advantage of legal loopholes, then maybe Extraction needs to give it up and find somewhere else to do business.	
We are opposed to the Draco Pad proposal. The fracking from the Draco Pad will run under a significant portion of the town in of Erie, Colorado in Boulder County where we reside. We ask that you deny this proposal.	07/13/202
14 I am 100% against this in Erie, especially so close to my home.	07/13/202
My child has developed severe breathing issues since moving to Erie. Our schools should be utilizing air monitoring systems to support a healthy environment for our children amd very growing population. We DONT need this next to our homes or schools!	07/13/202
My husband and I have made Erie our home for many years, and the community is very dear to us. We are now seniors who do all we can to maintain our health. As cancer survivors dealing with cardio and lung issues, we know these and other illnesses can be both caused and made worse by exposure to the chemicals used in fracking. Air quality is a major concern, with most of the pollutants coming from Weld County. Emissions from Draco's 26 wells would add alarmingly to those pollution levels. Erie was one of the disproportionately impacted communities visited by ECMC last year at a listening session re: cumulative impacts. I was there along with other residents and some of our local officials to tell you that "we've had enough!" After roughly 15 years of large scale drilling operations in/near town, Erie is saturated with producing, aging and plugged wells. We've learned that these heavy industrial operations do not belong in or anywhere near our densely populated neighborhoods. We've also learned that oil and gas is forever and so is our responsibility to monitor it. Erie has a heaping plateful in that regard because spills and leaks happen all the time and are considered business as usual. We note a disturbing trend, with an uptick of problems that arise after wells are decommissioned (i.e. orphaned wells, historic spills, methane in soil, etc.). Environmental damage, health concerns and safety risks are the detrimental legacy we are left to contend with. The experimental/unproven nature of the 5+ mile long horizontal well bores with unknown consequences rules Draco out as a sound plan. The poisoning of vast quantities of fresh water, and far-reaching climate impacts further illustrate its shortcomings. Benefits to the community are zero. Please vote to deny the application.	07/14/202
I am against the proposal for the Draco project due to health and environmental concerns based on science. Our air and water quality are at stake and as a homeowner in Erie in Boulder County I firmly reject a proposal to drill unprecedented horizontal fracking lines under our town and neighborhoods. We deserve access to clean healthy air and water.	07/14/202
As a homeowner and resident within the path of these underground well bores, I am great concernedly about the scope of this project, as well as the fact that this has never been done before to this degree. I feel much more testing should be done and many more things should be considered before this project is blindly approved.	07/14/202
This is a waste of water in a drought-prone area. The safety risks to drilling this far under a populated area is reason enough not to do it.	07/14/202
This should not be happening in our family town. Fracking causes earthquakes and potential health problems. As a real estate agent, this will have a negative impact on people wanting to move to this area. It's not worth it!	07/14/202

Please do not initiate this project which will have a significant negative environmental impact and will like create dangerous conditions for the physical health of the population of this town.	07/14/2024
As a homeowner and resident I strongly oppose this plan. This proposal runs under a large section of Erie, running under multiple neighborhoods, including under my home. I'm highly concerned about the lack of safety, environmental impact, air quality impact, long term impacts, hazard with existing mines, oil wells etc. Why is this ok?	07/14/2024
As a homeowner and resident within the path of these underground well bores, I am against this project. Mainly due to the scope of this project, the fact that this has never been done before to this degree. Also an incredible amount of water estimated to be used and we are a dought prone area. I feel much more testing should be done and many more things should be considered.	07/14/2024
We just recently became aware of the Draco drilling project that is set the effect the town of Erie. We received a legal packet in the mail last week regarding this project and have since been doing our own research (as the legal packet was not 'general public' friendly). With a drilling project of this magnitude, I'm asking that the state hold off on giving approval and requiring the OG company to research the effects a 5 mile long horizontal boring will have on the health and well-being of an entire town. This project has developed like any gas and oil company would conduct themselves, profit first, clean up and health of the land second. The town of Erie is one of the fastest growing towns in Colorado, and having an unstudied boring project directly under a majority of the new building sites seems more than unresponsible and insensitive to the residents this project will affect. I'm not opposed to the project, but would feel more comfortable with a comprehensive study of the effects the unnaturally long horizontal boring may have on the town, land, and residence. I also have a concern that a majority of the drilling will take place within Boulder county, not Weld county.  As a Colorado native, outdoor enthusiasts, and parent of young children, I ask the state to make a responsible decision with this OG project and require the gas company to do their due diligence before they are allowed to begin this project.	07/14/2024
I am a resident of Erie Highlands. We have enough drilling going on around us we do not need more. There is a recap of a failed oil cap right now and is enough stress. I do not want any drilling running under my home. We do not need any explosions or leaking around our homes. We deserve to feel safe where we live.	07/14/2024
Civitas has a terrible record of being a responsible extractor in the area, and I don't understand why we'd allow them to expand that without a solid plan in place. They're using over 500 MILLION gallons of water that cannot be reused or recycled during a severe drought. There's no timeline or plan for the 22 wells in the way that will be abandoned due to this project. There's absolutely no consensus from County and Civitas geological surveyors on the impact of drilling in a geohazard area due to multiple old mines. Most importantly, the size and scope of the project is total unprecedented and there as not been sufficient testing on lateral well bores that are 5 miles long, much less in a highly populated area.	07/14/2024
As a homeowner directly affected by this project, I am completely opposed to it; and fully believe it should be postponed/cancelled until further testing can be done.	07/14/2024
28 I am opposed to this project. It is not worth the risk to the families who live in the homes above this unprecedented line. Erie should be moving away from drilling not embracing it.	07/14/2024
29 I'm a homeowner in Erie Colorado in the path of this plan. It's shocking that a plan that affects the environment so much has been approved without the knowledge or input of taxpayers in the area. Draught could worsen as a result of the reckless waste of water. Please deny or delay this plan until it can be confirmed as safe for the community.	07/14/2024
As a homeowner in the affected area, I am strongly opposed to this project. It is irresponsible to begin this project without a full understanding on the potential short and long term impacts to the health of the people who live here, the environment, property values, etc. Additionally, using this much water that cannot be repurposed is insane.	07/14/2024
I am a homeowner in Erie, Colorado that is within the affected path of the proposed drilling site and I am strongly against having Civitas drill beneath my home. We are already dealing with another company that has capped and abandoned a well that is now leaking harmful amounts of methane. The company no longer operates in the state and we have had to fight tooth and nail to get the land developer to find a company willing to cap it correctly. More to the point though, this area of Colorado is frequently within drought conditions and taking millions of gallons of water and making it unusable is not responsible planning. This well is too close to a rapidly developing area that is very heavily residential.	07/14/2024
As a homeowner in the affected area, I am strongly opposed to this project. The company is planning to use 541 million gallons of water that cannot be reused or recycled while Weld and Boulder are	07/14/2024
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	under severe drought warnings. There isn't a plan or timeline from the company for the plug-and-abandon operations of the 22 wells in the path of this project, and we've already had an issue with wells not being capped in the past. This plan is within a heavily residential area that is growing. This seems irresponsible to continue until we know this is beneficial and safe to the residents it will be affecting.	
33	I'm a homeowner that would fall within the proposed area. I have a 2 month old son (our first) and the idea of raising him in a home above this when we don't know how it could affect the above and surrounding area is terrifying. Our area has struggled with leaking and abandoned wells that have caused neighbors health problems and especially while my son is so young and susceptible, I'm scared about this causing him lifelong health damage. We moved to Erie as a wonderful place to raise a family and I fear that this is something that would force us (and likely many others) out. I ask you to consider this: If this was going to happen below your home, where your kids/family live, would you allow it to happen? Would you take the chance? And if something did happen, could you live with the regret that you let it happen to them? Ask yourself this, because this is the question I'm having to ask myself.	07/14/2024
34	I cannot believe this is happening with so little communication to the homeowners this will affect. Please stop this until there is a vote as this affects the physical health of the residents and will have an negative environmental impact.	07/14/2024
35	As a homeowner and resident of Erie I am horrified that this has been approved by Weld county and we as resident have had no say in this. I am strongly opposed to this project and am scared of the direct implications it will have on our town, our health and environment. Please prevent this from happening.	07/14/2024
36	I am strongly opposed to this project moving forward as a homeowner with young children in the affected area. It would be completely irresponsible to move forward with this in such a densely populated and rapidly growing area. An in-depth analysis to understand environmental impact to the thousands of residents in this area must be conducted.	07/14/2024
37	I am a resident of Erie Highlands and am strongly opposed to the Draco oil and gas development that will go directly under our neighborhood.  As a statewide commission, your responsibility is to ensure the health and safety of Colorado residents. With that lens, my primary concerns center on the track record of the extraction company (Civitas) and the lack of clear understanding of the implications of the scale (lateral reach) of this project.  Specifically:  - Civitas's own records show that they will use 541 million gallons of water that cannot be reused or recycled while Weld and Boulder are under severe drought warnings. My family has farmed in this area since 1872 and water and water rights are precious commodities. This seems like an exorbitant waste of natural resources in the name of corporate greed.  - There does not seem to be a plan or timeline from Civitas for the plug-and-abandon operations of the 22 wells in the path of this project. We already have a leaky abandoned well in our neighborhood, so this is not a hypothetical situation.  - there seem to be conflicting or unknown conclusions from both Weld County and Civitas geological surveyors on the impact of drilling in a geohazard area (i.e old mines)  - the 5-mile-long lateral well bores have unknown impacts in a highly populated area. We did not move here and sign dozens of pages of legal disclosures about abandoned mines and wells beneath us to have a brand new one added to our concerns.	07/14/2024
38	community health annd well-being are better understood.  As a resident I am strongly opposed to this project. I am also strongly opposed to the water waste that will be a result of this project. And I am strongly opposed to Civitas because they do not have a good track record. We have purchased these homes with good faith that we will raise families in a safe area. This is not something we were warned about when we purchased those homes. This will negatively impact the town of Erie, and potentially the value and safety in the area. Erie has already taken on enough public waste, we do not also need to add fracking from a company that cannot be trusted.  Please consider the people who purchased homes and land at great cost. We should have a voice.	07/14/2024

Im an erie homeowner and parent of young children. We are in the path ofnthis fracking project. I am deeply opposed to this Fracking in residential areas is banned any many health conscious western countries and should be banned in Colorado as well. Fracking releases compounds into the air, such as benzene, ethylbenzene, toluene, and n-hexane, which have been linked to birth defects, neurological problems, blood disorders, and cancer. The water used will remain forever tainted, since the project documents state its too expensive to clean	07/14/2024
As an Erie resident and in Boulder County I'm upset to learn about this only 3 days before comments end. Communication is awful regarding this industry not too mention this organization has an awful track record and puts our families, wildlife and way of living in danger. This should not be able to go through.	07/14/2024
I definitely do not agree with this plan, nor do I feel it has been publically informed the correct way to residents, especially those in the affected area. We are in the affected area, have not received any written or verbal communication via mail, or phone. This is unacceptable, and unsafe with an enormous amount of health concerns. The current drought for Weld and Boulder Counties continues for the residents, yet they / you want to use how much water that cannot be recycled/reused. Not ok. There needs to be a more thorough plan, and more informative communication. Neighbors have already agreed to protest in person at the main site, and company offices if our voices are not heard. Local news sources have also been notified.	07/14/2024
<ul> <li>42 I am strongly opposed the this drilling because it will occur in Boulder county under my house while it Weld county who would be approving it.</li> <li>The extraction company Civitas' own records show that they will use 541 million gallons of water that cannot be reused or recycled while Weld and Boulder are under severe drought warnings</li> <li>No transparent plan or timeline from Civitas for the plug-and-abandon operations of the 22 wells in the path of this project</li> <li>A poor track record for Civitas as a responsible extraction company in Erie</li> <li>No alignment from County and Civitas geological surveyors on the impact of drilling in a geohazard area (i.e old mines)</li> <li>Unprecedented and untested 5-mile-long lateral well bores with unknown impacts in a highly populated area</li> </ul>	07/14/2024
43 I do not feel it is safe to launch a unprecedented project like the Draco pad in our highly populated and growing area of Erie. The 5 mile stretch for the well bores are dangerous and go into the heart of a community where majority of residents reside. I don't think it is safe to experiment with a project like this in a highly populated area. It is also an area with many underground mining obstacles from previous coal mines, so.e not fully understood and accurately mapped and already fracked and existing well pads. Even if the well pads are plugged and abandoned I don't think it is safe to run the risk of a accident occurring with a potential new Draco well bore. Please take our community feedback into account and understand a project like Draco is not safe and puts our community at risk.	07/14/2024
44 I strongly opposed to this project because that could lead for a big environmental disaster, and especially millions of gallons of water that cannot be reused or recycled while Weld and Boulder are under severe drought warnings. This could also impact our houses long term and could lead to structural and foundation issues. This project should be terminated immediately.	07/14/2024
This company has a poor history of handling the shutdown and cleanup of their operations.  This is a highly populated area with a high risk of negative impact to the residences.  This is a terrible use of water at a time when Colorado is in drought conditions.	07/14/2024
46 Because the Draco pad is to be located in an area rated as a severe subsidence hazard, I am concerned about the lack of a full geohazard study. The comments submitted by the CGS to Weld County do nothing to ease my worry!	07/14/2024
To excerpt: Jill Carlson with CGS says "The site is located within a mapped "severe" subsidence hazard area (CGS publication EG-09, plate 6, 1975)." The map Ms. Carlson used is not the most legible hazard map of the area! USGS produced one in 1997. In other parts of her communication, Ms. Carlson says "which typically corresponds to a low subsidence hazard" and "potential (but probably low) subsidence hazard." To me, "typically" and "probably" indicate that there are variables which will affect the actual risk factor. Where is the study that looks at those variables and calculates the actual risk?	
When the Regulatory Analyst for Weld County forwarded Ms. Carlson's message to CIVITAS, she said "I have not had a location that is within the Geologic Overlay District." (Said analyst started working at Weld County in 2018). CIVITAS responded, "Leveraging comprehensive analysis of the nearby well records and current mine extent as detailed by the Colorado Geologic Survey, Extraction concluded that the geological hazard presents no risk to pad construction and subsequent drilling activities."	

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		1)Which wells were reviewed that were inside a geologic subsidence hazard zone? If none, how does data from those wells apply to this subject? 2)How nice that there is no risk to CIVITAS, but that doesn't address risk to human, animals, waterways and structures that are not owned by CIVITAS. 3)The Eagle mine is not the only mine in very close proximity to the proposed Draco pad. The Boulder Valley #1 and Columbine mines lie directly to the west. The lines that CIVITAS will run from Draco go to the west. Why is there no concern that the drilling operations will interfere with the integrity of those mines? 4)What is the estimated vibrational intensity that would be needed to cause mine collapse and is it certain that drilling operations will not reach that level? Does this take into account the subsurface faults in the immediate area?  State documents show that ECMC did not require CIVITAS to submit a geological hazard mitigation plan. This is negligence. Will the state pay for subsidence damages that might have been controlled if they had required a full study of the problem?  Lastly, CIVITAS Geological Hazard map is invalid. It is shown with a resolution above that dictated by	
	47	their source data and numbers were not entered for the "Distance to Nearest" line items.  I am shocked at the fact that weld county would approve this so close to our community in Erie. Our health is on the line as well as the numerous children in the surrounding schools. I do not support this at all.	07/14/2024
F		I strongly oppose the Draco project that will effect our health as well as the environment.	07/14/2024
⊢	49	I strongly disapprove this project as it is bad for our environment as well as the health of our children in surround schools and all Erie residents. This will contaminate our water and can oppose long term health issues.	07/14/2024
		I am beyond disappointed that weld county approved a project that is putting our lives at risk as well as the environment.	07/14/2024
		NO! Do not drill under homes. Risk not worth reward. Use the open land. Do not compromise people's homes.	07/14/2024
	52	Allowing this extensive mining under homes is irresponsible and wastes community resources (water). To allow this plan to proceed puts the residents lives at risk and needs to be stopped.	07/14/2024
		Our home is in the impacted area (found out via a Facebook post); however have not received one ounce of information on the proposal nor was aware of it when moving in to our home	07/14/2024
		I strongly oppose the Draco project. We moved into our home in 2020 and have received no info regarding this and we are concerned about the health effects of these operations. Additionally, we are concerned about the amount of water use for the project in a state that already has water shortages. This project appears to be irresponsible and I strongly oppose it.	07/14/2024
		I strongly oppose the Draco project. We moved into our home in 2020 and have received no info regarding this and we are concerned about the health effects of these operations. Additionally, we are concerned about the amount of water use for the project in a state that already has water shortages. This project appears to be irresponsible and I strongly oppose it.	07/14/2024
	56	NO to EXTRACTION OIL & GAS in Erie. Please don't let them to kill our beautiful Erie.	07/14/2024
Ĺ	57	I do not want any oil and gas in backyard!!	07/14/2024
		Opposed to Draco improvements drilling project over my neighborhood in Erie. Hazardous to health. Please shut this down!	07/14/2024
		Strong opposition to the moving forward of the Draco pad, chief concerns including: The extraction company Civitas' own records show that they will use 541 million gallons of water that cannot be reused or recycled while Weld and Boulder are under severe drought warnings; No transparent plan or timeline from Civitas for the plug-and-abandon operations of the 22 wells in the path of this project; A poor track record for Civitas as a responsible extraction company in Erie; No alignment from County and Civitas geological surveyors on the impact of drilling in a geohazard area (i.e old mines); Unprecedented and untested 5-mile-long lateral well bores with unknown impacts in a highly populated area. This project appears to be grossly understudied, with a high potential negative impact to a densely populated community in Erie.	07/14/2024
		We lived in Weld County (Vista Ridge) for 12 years. We love Erie, but decided that Weld County officials had sold out the residents to curry favor with the oil & gas industry. As a result, we decided to build a new home in Erie, but un Boulder County instead since Boulder County is far more	07/15/2024

conservative when it comes to hydraulic fracturing.	
Now, we have come to learn that Weld County has determined that they can reap the financial benefits wile adversely affecting residents in Boulder County by approving the Draco Project. This project will infringe upon the rights of those WH do not wish to be near fracking and do not wish to have the already expansive solos of Erie beneath our homes disturbed.	
After seeing the likes of Louis Allstadt, former VP if Mobil Oil Sue to prevent fracking activity in his neighborhood and Rex Tillerson of Exxon Do the same in his neighborhood, I am FIRMLY against it in mine. If the two former heads of the 2 largest oil & gas companies in this country feel fracking is NOT APPROPRIATE OR SAFE for their neighborhoods or their children, it is not Appropriate or safe for ours in Compass. Mr. Allstadt was quoted in court saying the following	
"Making fracking safe is simply not possible, not with the current technology, or with the inadequate regulations being proposed," said Allstadt, retired executive vice president of Mobil. He spoke during a news conference called by Elected Officials to Protect New York, a group which represents more than 800 officials from all 62 counties statewide that have adopted anti-fracking resolutions.	
With that said, I am sure my neighbors and I would be supportive of legal action just like Mr. Allstadt and Mr. Tillerson both of whom won their respective cases in court.	
I would implore you to reject Weld County's claim that they have the legal authority to fracture across county lines into the homes of residents of Boulder County.	
Should you have any questions, please feel free to reach out to me directly.	
Hello, as a homeowner in the affected area on the Boulder County side, I am concerned about several things. First and foremost, I have great concerns about the impact to my home and health. Next, I'm worried about any potential impacts to the environment and the animals around us. Finally, I am confused as to how we have not heard about this until a neighbor alerted me. Thank you.	07/15/2024
Allowing the unnecessary mining under homes is irresponsible and wastes community resources (water). To allow this plan to proceed puts the residents lives at risk and needs to be stopped. We purposely built in Boulder county to avoid such careless plans to the health and safety of families, children and pets.	07/15/2024
Why are we just hearing about this? I may not be directly affected but very close! And drilling under all of these homes and the water usage is unacceptable. Please don't let this happen!	07/15/2024
Hard no. Go drill somewhere else where there's less population!	07/15/2024
We bought our home 8 years ago in Erie. We love the community but oil and gas has been a constant nightmare. My entire family has consistent headaches since moving here. When we travel to other states we are suddenly headache free. Please protect our neighbors by not allowing more drilling to happen!	07/15/2024
We have a young family and are already very concerned about the air quality in Colorado, exacerbated by oil and gas activity, particularly in Weld county. We chose to move to Boulder county given their opposition to oil and gas activity, so hearing of the Draco proposal is very disappointing and concerning. I have respiratory issues on poor air quality days and I fear if that activity increases we will need to leave our home, which is heartbreaking. We love our home and this beautiful area, and would hate to see it ruined by this irresponsible act. We cannot let this happen.	07/15/2024
Civitas' own records show that they will use 541 million gallons of water that cannot be reused or recycled while Weld and Boulder are under severe drought warnings. This is entirely irresponsible and harms the welfare of our communities. Further, there is no transparent plan or timeline from Civitas for the plug-and-abandon operations of the 22 wells in the path of this project - A poor track record for Civitas as a responsible extraction company in Erie - No alignment from County and Civitas geological surveyors on the impact of drilling in a geohazard area (i.e old mines) - Unprecedented and untested 5-mile-long lateral well bores with unknown impacts in a highly populated area. At the very least, the Draco project be delayed until these impacts are better understood. I urge you to put our communities' health and safety ahead of Civitas's interests.	07/15/2024
	Now, we have come to learn that Weld County has determined that they can reap the financial benefits wile adversely affecting residents in Boulder County by approving the Draco Project. This project will infringe upon the rights of those WH do not wish to be near fracking and do not wish to have the already expansive solos of Erie beneath our homes disturbed.  After seesing the likes of Louis Altsadt, former VP if Mobil Oil Sue to prevent fracking activity in his neighborhood and Rex Tillerson of Exxon Do the same in his neighborhood, I am FIRMLY against it in mine. If the two former heads of the 2 largest oil & gas companies in this country feel fracking is NOT APPROPRIATE OR SAFE for their neighborhoods or their children, it is not Appropriate or safe for ours in Compass. Mr. Alfstadt was quoted in court saying the following.  "Making fracking safe is simply not possible, not with the current technology, or with the inadequate regulations being proposed," said Alfstadt, retired executive vice president of Mobil. He spoke during a news conference called by Elected Officials to Protect New York, a group which represents more than 800 officials from all 62 counties statewide that have adopted anti-fracking resolutions.  With that said, I am sure my neighbors and I would be supportive of legal action just like Mr. Allstadt and Mr. Tillerson both of whom won their respective cases in court.  I would implore you to reject Weld County's claim that they have the legal authority to fracture across county lines into the homes of residents of Boulder County.  Should you have any questions, please feel free to reach out to me directly.  Hello, as a homeowner in the affected area on the Boulder County side, I am concerned about several things. First and foremost, I have great concerns about the impact to my home and health. Next, I'm worried about any potential impacts to the environment and the animals around us. Finally, I am confused as to how we have not heard about this until a neighbor alerted me. Thank you.  Allo

68	As a homeowner in the affected area, I am strongly opposed to this project. It needs a full study on the potential short and long term impacts to the health of the people who live here, the environment, property values, etc. The results then need to be openly shared with the public.	07/15/2024
69	We need far more testing on 5 mile lateral wells. How many times have companies risked public health for profit. There are plenty of ways for O&G to drill safely without this ridiculous untested proposal of 5 miles of wells underground through entire cities. And so many of us are just hearing this now? Who is looking out for our kids and how this could impact us? Spend less energy trying to sneak this past us and more on public thorough research and share that freely. If it is sound, THEN propose it. We aren't just the casualties of your business if things go south.	07/15/2024
70	I strongly oppose this project. Not only is it unsafe for the residents but also for the animals. This project should not be approved.	07/15/2024
71	Do the right thing and choose public health and well being over money.	07/15/2024
72	I'm opposed to drilling under our town. This is a major cause for concern	07/15/2024
73	We moved to Erie because it was a great place to raise a family. A drilling project like this under our neighborhoods with no real data on how it will affect residents is terrifying and makes me want to move. Please do the right thing and think of your residents instead of the large companies that will profit.	07/15/2024
74	I strongly oppose this monstrosity. The last thing we need is more fracking. My family's health and wellbeing have been negatively impacted by smaller operations in our neighborhood. Our community and our planet can't take any more toxic emotions from a poorly regulated industry. Please choose the health of our children over profit and maintaining the status quo.	07/15/2024
75	Horrible idea. this community does not need anything like that around here. Take it somewhere else.	07/15/2024
76	I left other places and moved to Colorado to have a better way of life. We do not need this negatively impacting the health of our city. No thanks!	07/15/2024
77	Subject: Strong Opposition to the Draco Oil and Gas Development Project	07/15/2024
	Dear Members of the Colorado Energy & Carbon Management Commission,	
	I am writing to express my strong opposition to the proposed Draco oil and gas development project by Civitas Resources in Weld County. The approval of this project would be an irresponsible decision with significant negative implications for our community, environment, and future generations.	
	**Past Issues and Company Track Record** Civitas Resources, through its subsidiaries, has a history of regulatory non-compliance and community opposition. In 2022, the ECMC rejected a plan for 18 wells in Broomfield and Erie due to concerns about proximity to residential areas and environmental impacts. Furthermore, their operations have previously resulted in significant air pollution and health risks, as evidenced by spikes in hazardous chemicals such as benzene near their sites. It is alarming that a company with such a track record is being considered for a project that would further endanger our community [oai_citation:1,Civitas leaves fight to tap oil, gas under Boulder County open space] (https://coloradosun.com/2023/05/08/boulder-county-oil-gas-civitas-blue-paintbrush/) [oai_citation:2,Two oil and gas drilling plans found too close to people, pronghorns] (https://coloradosun.com/2024/02/01/oil-gas-drilling-plans-rejected-erie-broomfield-weld-county/).	
	**Environmental Hazards**  The proposed drilling near sensitive areas, including the Aurora Reservoir and a Superfund site, poses severe environmental risks. The potential for contamination of our water supply is a critical concern, given that the reservoir stores drinking water for approximately 390,000 people and is a popular recreational area. The risk of seismic activity induced by hydraulic fracturing near fault lines and the potential for long-term environmental damage cannot be overlooked [oai_citation:3,Plan to drill for oil and gas near Aurora Reservoir is raising red flags] (https://coloradosun.com/2024/03/11/civitas-lowry-ranch-cap-aurora-reservoir-lowry-superfund/) [oai_citation:4,Civitas wants to build 166 oil wells in Denver, right by Superfund site] (https://www.fastcompany.com/91053140/a-sustainable-oil-company-wants-to-build-166-wells-in-suburban-denverright-by-a-superfund-site).	
	**Unprecedented Scope of the Project and Widespread Effects** The scale of the Draco project is unprecedented in our area, involving the drilling of numerous wells over a vast expanse. Such a large-scale operation in a densely populated region is not only unprecedented but also reckless. The long lateral well bores, extending for miles underground, introduce unknown risks and complications that have not been adequately studied or mitigated. This	

project's scope and the associated risks are beyond what our community should bear [oai\_citation:5,Civitas wants to build 166 oil wells in Denver, right by Superfund site] (https://www.fastcompany.com/91053140/a-sustainable-oil-company-wants-to-build-166-wells-insuburban-denverright-by-a-superfund-site) [oai\_citation:6.Crestone Peak's 55-square-mile Aurora drilling plan OK'd](https://coloradosun.com/2022/11/03/aurora-oil-gas-drilling-crestone-box-elder/).

The combination of Civitas Resources' questionable track record and the enormous scale of this project amplifies the potential for widespread negative effects. These include environmental degradation, health risks, and disruption of daily life for residents. The potential harm to so many people from this unnecessary project, driven merely by financial gain, is not worth the risk. It is not even close.

#### \*\*Protection Under Boulder County Regulations\*\*

It is worth noting that Boulder County has taken significant steps to protect its residents and environment from the adverse impacts of oil and gas operations. The county has implemented some of the strictest regulations in Colorado, including increased setbacks and stringent environmental safeguards. Despite these protections in Boulder County, the proposed Draco project threatens to undermine similar efforts in Weld County. We urge the ECMC to adopt a similarly cautious and protective stance, ensuring that the health and safety of Weld County residents are not compromised [oai\_citation:7,Civitas leaves fight to tap oil, gas under Boulder County open space] (https://coloradosun.com/2023/05/08/boulder-county-oil-gas-civitas-blue-paintbrush/) [oai\_citation:8,Two oil and gas drilling plans found too close to people, pronghorns] (https://coloradosun.com/2024/02/01/oil-gas-drilling-plans-rejected-erie-broomfield-weld-county/).

# \*\*Direct Impact on Our Neighborhood\*\*

Our neighborhood is directly in the path of the proposed drilling operations, which includes plans for horizontal drilling underneath our homes. This places our community at immediate risk of environmental hazards such as potential groundwater contamination, air pollution, and even seismic activity resulting from the fracking process. The unprecedented scope of this project, which includes drilling beneath residential areas, is alarming and unacceptable.

Living in an area where such invasive industrial activities are planned undermines the safety and stability we have worked hard to establish for our families. We chose this neighborhood to plant roots and create a safe, nurturing environment for our children. The approval of this project would force many of us to consider relocating, which is the last thing we want to do. We are deeply invested in this community, and this project threatens to disrupt our lives and well-being significantly. The thought of having to uproot our family and leave the area we love and call home is incredibly difficult to bear.

Furthermore, it is unacceptable that we only became aware of this project through a social media post, raising serious concerns about the transparency and legality of the notification process. Residents should be properly informed and given ample opportunity to voice their concerns before such significant decisions are made.

In conclusion, I urge the ECMC to consider the long-term health, safety, and well-being of our community. The Draco project is not in the best interest of the residents of Weld County. I strongly oppose its approval and request that the Commission prioritize public health and environmental protection over industrial development.

Thank you for considering my concerns.

78	I am strongly opposed.	This is not something	this neighborhood	d wants or needs. Please stop.
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79 I do not understand how something as expansive as this can be planned under the homes of a significant number of people. The town is already in the process of sealing numerous wells due to safety hazards and health concerns, so why should we open more? Not only are we concerned for our health but I can't believe the huge amount of resources that will be wasted to complete this project. The county should have never allowed for homes to be built here if they were going to

approve a project like this. The greed!

# 80 \*\*Concerns About Oil Drilling Near Homes and Protected Open Space

# 07/15/2024

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#### 1. Lack of Prior Notification

Residents were not informed in writing about the potential for oil drilling when they purchased their homes, leading to feelings of betrayal and concerns about property value impacts.

- 2. Water Usage During Drought
- \*\*Water Demand:\*\* Civitas intends to use 541 million gallons of water for the project. This volume of

water is significant, especially considering it cannot be reused or recycled.

- \*\*Drought Conditions:\*\* Weld and Boulder counties are under severe drought warnings. Using such a vast amount of water exacerbates the water scarcity issue, potentially affecting local water supplies and increasing tensions over resource allocation.
- 3. Lack of Transparent Plans and Timelines
- \*\*Plug-and-Abandon Operations:\*\* Civitas has not provided a clear plan or timeline for the plug-and-abandon operations of the 22 wells that intersect with the project path. This lack of transparency creates uncertainty about the project's duration, scope, and potential disruptions.
- \*\*Community Trust:\*\* Without detailed information, residents are unable to assess the risks and impacts accurately, leading to distrust in Civitas and local authorities.
- 4. Poor Track Record of Civitas
- \*\*History in Erie:\*\* Civitas has a documented history of poor practices in Erie, including safety violations, environmental damage, and inadequate responses to community concerns.
- \*\*Reputation and Accountability:\*\* This poor track record raises doubts about Civitas's ability to manage the new project responsibly and safely, heightening fears of negative impacts on health, safety, and the environment.
- 5. Geological Hazards
- \*\*Old Mines:\*\* The drilling area includes old mines, which present geohazards such as ground instability and the potential for subsidence.
- \*\*Survey Discrepancies:\*\* There is no alignment between county and Civitas geological surveyors on the risks posed by drilling in this geohazard area. The lack of consensus on geological impacts adds another layer of uncertainty and risk.
- 6. Unprecedented and Untested Drilling Methods
- \*\*Lateral Well Bores:\*\* The project proposes the use of five-mile-long lateral well bores, a technique that has not been tested in such a populated area.
- \*\*Unknown Impacts:\*\* The impacts of these untested methods are unknown, raising concerns about potential environmental, structural, and health risks to the community.
- 7. Call for Delay

Given these substantial concerns, residents believe it is reasonable to delay the Draco project until these impacts are better understood and addressed. A thorough assessment and transparent communication are essential to ensure community safety and trust.

81 I write this message 1) to express my strong opposition to Civitas' proposed Draco Pad fracking operation just east of Erie city limits and 2) as a homeowner in Erie Commons under which Civitas plans to run its horizontal bores.

07/15/2024

As ECMC evaluates Civitas' application, I trust that you will consider 1) the risks to densely populated areas posed by horizontal well bores of what appear to be unprecedented length, 2) examine what the geohazards are through which the bores will be directed, 3) the risk of boring through an identified severe subsidence hazard area, 4) Civitas--and its numerous subsidiaries--numerous incidents of spills and violations, 5) the certain further degradation of air quality in this area of the Front Range, 6) the enormous volume of water (which, once made toxic, creates its own issue of disposal, and 7) the long-term consequences if toxic drilling wastes are deposited at the Front Range Landfill (from what I understand, most wastes from fracking are exempt from the regulations of the Resource Conservation & Recovery Act).

All of us know that we rely on fossil fuels and the countless products that derive from them, but Civitas' proposed Draco Pad entails such risks, unknowns, and downsides that I hope that ECMC will determine that the well-being of regional residents outweighs the gains that Civitas and its shareholders would realize from this venture. Thank you.

We moved to Erie because it was a great place to raise a family. A drilling project like this under our neighborhoods with no real data on how it will affect residents is unacceptable. The outrageous amount of water required is irresponsible. At no point during the purchase of our house was this disclosed. It makes me want to move. Please do the right thing and think of your residents instead of the large companies that will profit.

07/15/2024

83	This project should absolutely not be approved. One county should not be able to greenlight a project that negatively impacts the residents of surrounding counties who get no say in the matter. The amount of water used for this project is unconscionable and the ramifications for the huge number of residents who live directly on top of these wellbores is unjustified. Please do the right thing and listen to the people directly impacted who are opposed to this. We should have a say in what goes on in our own communities.	07/15/2024
84	Second the points that have been made in the comments so far. As someone who lives in a neighborhood that would be affected by this, we deserve to have our voices heard on this decision. We love living in Erie, but something like this is one of the only things that would get us to consider leaving.	07/15/2024
85	I agree with many of the comments so well stated, but want to add my voice to those who are opposed.  Fracking is not a clean activity. I wouldn't want to move to a neighborhood that has been on a toxic site. One county dictating a future to other counties' neighborhoods is outrageous. Families moved there with certain lifestyle expectations and others are imposing a radical change. It is not okay. Please oppose this project. Thank you.	07/15/2024
86	I am writing to express my vehement opposition to the proposed Draco Pad extraction facility. This project represents a grievous threat to our community's safety, environment, and overall well-being. It is beyond comprehension that Weld County would approve such a reckless venture, given the multitude of unresolved and critical issues associated with it.	07/15/2024
	First and foremost, the extraction company Civitas has demonstrated a blatant disregard for our community's water resources. Their own records indicate they will use an astronomical 541 million gallons of water for this project - water that cannot be reused or recycled. This is utterly unacceptable, especially when Weld and Boulder counties are grappling with severe drought warnings. It is a slap in the face to every resident who has been conscientiously conserving water, only to see such wastefulness sanctioned by our local government.	
	Furthermore, Civitas has yet to provide a transparent plan or timeline for the plug and abandon operations of the 24 wells within the proposed production area, many of which are within Erie limits. How can we trust an operation that cannot even clearly outline its approach to managing the wells already in existence? This is a glaring oversight that puts our environment and health at risk.	
	Civitas's track record in Erie is nothing short of abysmal. Their history as an extraction company is marred by negligence and irresponsibility. This company has repeatedly shown that it cannot be trusted to operate in a manner that prioritizes the safety and well-being of our community. Why should we believe that this time will be any different?	
	Additionally, there is a severe lack of alignment between the County and Civitas's geological surveyors regarding the impact of drilling in this geohazard area, which includes old mines. This lack of consensus is deeply troubling and highlights the potential for disastrous consequences. The idea of drilling unprecedented and untested 5-mile-long lateral well bores in a highly populated area is reckless and irresponsible. The unknown impacts of such a venture could be catastrophic, and it is our community that will bear the brunt of these risks.	
	The traffic and transportation concerns associated with this project are equally alarming. While Extraction has agreed to conduct traffic impact studies and take financial responsibility for road damage, the details of these agreements are still under negotiation. This uncertainty is unacceptable. We need concrete commitments and actionable plans, not vague promises that leave room for loopholes and evasion.	
	Moreover, the proposed landscaping and fencing solutions are insufficient. An 8-foot chain-link fence with privacy slats along the western edge of the pad does not align with the aesthetic and functional needs of the future neighborhood. Erie has rightly proposed further consultation to explore alternative materials and designs, but these discussions should have been a prerequisite, not an afterthought.	
	Finally, the air quality and environmental issues posed by this project cannot be overstated. The entire OGDP is currently under review, and Erie intends to ensure that all available best management practices, policies, and engineering controls are implemented. This is the bare minimum we should expect to mitigate the public health and environmental impacts of this oil and gas development. Anything less is a dereliction of duty to our community and future generations.	
	The Draco Pad project is an ill-conceived, dangerous, and irresponsible endeavor that poses numerous threats to our community. Civitas's history, the lack of transparent planning, the	

	environmental risks, and the potential for catastrophic impacts make this project wholly unacceptable. I urge all responsible authorities to reconsider this approval and put the health and safety of our community first.	
87	I am writing to express my strongest opposition to the proposed oil and gas well permit for a location in the SE4 of Section 21, Township 1 North, Range 68 West, Weld County, Colorado. As a homeowner residing near this proposed site, I have significant concerns about the potential negative impacts on my community and the environment.  My opposition is based on the following key reasons:	07/15/2024
	1.Public Health Risks: Oil and gas well operations can release harmful air and water pollutants, including benzene, methane, and volatile organic compounds (VOCs). These pollutants have been linked to respiratory problems, cancer, and other health issues. Studies have shown a correlation between proximity to oil and gas development and increased health risks for residents.	
	2.Environmental Damage: The process of hydraulic fracturing (fracking), commonly used in oil and gas extraction, can contaminate groundwater with chemicals and lead to increased seismic activity. Accidental spills and leaks can also devastate local ecosystems. Protecting our clean water sources in Colorado and maintaining a healthy environment is essential for our community's well-being. If you consider the amount of water waste alone, the potential damage is astronomical and unacceptable.	
	3. Financial Burden on Taxpayers: A recent article in The Guardian, titled "Colorado oil and gas wells can't fund their own cleanup. Taxpayers may foot the bill," highlights the concerning reality that many oil and gas wells are not bonded adequately to cover the significant costs of well closure and environmental remediation. This leaves taxpayers on the hook for cleaning up abandoned wells, posing a substantial financial burden to our communities.	
	4.Impact on Property Values: The presence of an oil and gas well site near my home can significantly decrease its property value. This not only affects my financial security but also reduces the overall value of our comunnity and neighborhood.	
	In light of these concerns, I urge you to deny the permit for this oil and gas well. There are safer and more sustainable ways to meet our energy needs than fracking. I believe that protecting the health of our community, the environment, and our financial security should be the top priority. Don't let this happen to Erie!	
88	I am currently renting in Flatiron Meadows and love this community. I have been searching for a home to buy here. However, if the lines go in, I certainly will not buy here. This project will destroy property values for my amazing neighbors and friends. We all moved in because Boulder county has a moratorium on fracking. Whatever this project is seems shady and underhanded. The why and the benefit to Erie residents escapes me. Don't sacrifice humans for profits.	07/15/2024
89	The Draco project poses unreasonable risk to Colorado citizens and environment. Extensive additional study should be required before this project is allowed to proceed, if it ever is	07/15/2024
90	Strongly against Draco pad.	07/15/2024
91	I am opposed to the Draco project being approved for the following reasons:	07/15/2024
	1. They will use over 541 MILLIONS of non recyclable water. We don't have enough water in this state as is - plus every summer has a drought restriction.	
	2. There are 22 wells in the path of this project w/o.a timeline for plug and abandon.	
	3. They're drilling in an area of mining and there's no evidence that it will not cause issues with the old mines and the residences and businesses on top of them.	
	4. This is an untested 5 mile long lateral well bores with unknown impacts in a highly populated area.	
	Please do not Approve this project without addressing these issues.	
	The Sterr Family 903 Pope Dr, Erie, CO 80516	

when we're in a drought and cannot spare water. The length of the lines is of concern, as well as the obvious issue of underground mines. The ground in this area cannot guarantee the stability required for drilling. I don't want to risk having fracking fluid in my water.  93 Reasons for concern include:  - The extraction company Civitas' own records show that they will use 541 million gallons of water that cannot be reused or recycled while Weld and Boulder are under severe drought warnings - No transparent plan or timeline from Civitas for the plug and abandon operations of the 22 wells in the path of this project - A poor track record for Civitas as a responsible extraction company in Erie - No alignment from County and Civitas geological surveyors on the impact of drilling in a geohazard area (i.e old mines) - Unprecedented and untested 5 mile long lateral well bores with unknown impacts in a highly populated area  94 As a homeowner in the affected area, I am strongly opposed to this project. It needs a full study on the potential short and long term impacts to the health of the people who live here, the environment, property values, etc. The results then need to be openly shared with the public. It's also a gross use of already scarce resources, do better!  95 I am opposed to the Draco project being approved for the following reasons: 1. They will use over 541 MILLION gallons of non recyclable water. We don't have enough water in this state as is - plus every summer has a drought restriction. 2. There are 22 wells in the path of this project who a timeline for plug and abandon. 3. They're drilling in an area of mining and there's no evidence that it will not cause issues with the old mines and the residences and businesses on top of them. 4. This is an untested 5 mile long lateral well bores with unknown impacts in a highly populated area. Please do not Approve this project without addressing these issues.  96 I strongly oppose this!! Right in the middle of all of these neighborhoods seems extremely irre	5/2024 5/2024 5/2024
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10 We have strong opposition against Draco pad, fracking and proposal of running oil & gas pipelines under our houses. The proposed plan can compromise public health and endanger our water resources. The gas and chemical leaks from such projects can cause serious lung diseases such as Asthma, and can even cause cancer. The methane gas leak is also responsible for increasing global temperature. The increase in temperature is responsible for extreme weather patterns. One of such extreme weather caused Marshal fire that engulfed 1200 plus houses in Boulder County community not far away from us. That scary day/night of December 30, 2021 is still live in our memory. The seismic activity can damage our home where our family with little kids take shelter.	5/2024
As you know, within the limit of the Town of Erie, there are several cases of oil leaks that have leached into the ground and contaminated ground. There is also a case of methane leak from oil and gas sites and even plugged and abandoned well within the Town of Erie. Cases like these have already made us worried about potential health risks within our community. This project has added more headaches and stress in our life.	
Officials of Weld County cannot go on their own liberty and approve such projects that have dire effect on public health and environment of not only the population of their own County but also to the residents of adjacent Boulder County. This act violates our right for clean air and clean water.	
The state of Colorado has spent millions and billion of dollar for air quality and clean water. Residents have spent millions of dollars in zero emission vehicles, and solars in a hope of breathing clean air and reduce our foot print that causes global warming. This project that runs through populous area of the Town of Erie makes all of our efforts and hope to attain clean air and water in vain. This is an example of sheer corporate greed that puts first priority on profit but no regard to public health and	

_		+
	our environment.	
	Therefore this proposal should be stopped because it compromise public health, endanger drinking water, devastate our natural resources, risk structural integrity of our house and causes stress in our life.	
10	I agree with the numerous opposition posts already submitted. Draco has mot been transparent enough for this project or been responsible and ethical in its previous projects. Shame on you Weld County for approving a project like this without an extensive impact study. We are a densely populated residential area on top of old mines. We are not the vast open fields of northeastern Weld. I've spent my entire life building equity in the largest asset of my life that may now be threatened by an ill conceived experiment. I view this as an attack on me personally, the community and the environment. How dare you compromise our financial well being, potentially compromise our health and safety, squander a precious resources that may in turn contaminate our ground water (the same water that routinely gets pumped from our basements to our backyards where children and pets are exposed). I am already battling cancer and do not need the additional exposure to harmful chemicals and air pollutants. Don't approve this ridiculous endeavor!!!	07/15/2024
	Hi, I am a resident in the neighborhood directly in the path of the proposed fracking operations. One of the reasons we bought in Boulder County in Erie was for its protections against drilling, fracking and oil operations especially in residential neighborhoods. However, this weld project is proposing to go underneath the town of Erie and across county lines, which is completely irresponsible and ridiculous. We have multiple family members with asthma and are quite sensitive to air pollution. The proposed project will reduce our air quality and we have no idea of the long term effects on our persons, animals, or our propertg. We invested in a home in this area as it did not seem to have foundation settling issues and now the negative impacts of this project will be paid not by the companies drilling & profiting from this project, but by the residents in its wake. We've had multiple issues with oil & gas leaks in the area even on decommissioned drilling sites, so there is absolutely no way that this one will be without significant environmental impact. Pick another area of land, not where thousands of people, their children, and their schools lie. This is a completely irresponsible development & project and is endangering your citizens.	07/15/2024
	As homeowners in the Compass subdivision in Erie, Co, potentially impacted by such a ridiculous project that can substantially and negatively affect our health and wellbeing, as well as the environment in which we live, we object to drilling under our homes. Home and business owners should have a say in this process which so widely affects us. Do not proceed with such a project, leading to unknown results to our properties and our health. We object in every way!	07/15/2024
10 4	I strongly oppose to Draco. Without strong evidence that this is geologically safe, safe for the many homes above the fracking lines, and proof that it won't cause widespread damage to property and life, this is just irresponsible. We live on the Boulder County side of Erie and moved here for protections against fracking and wells. Does Boulder County have a say? Why aren't we protected? This is an unsafe proposition that will plummet property value. There are so many open spaces - keep oil activity away from neighborhoods and schools. Coloradans deserve better than corporate greed and irresponsible practices. We already have had air pollution alerts nearly every day WITHOUT this project - if Erie can't manage healthy air quality without a project this big, it will only get worse once it begins. The company is not reputable and doesn't care about the lasting effects on people and the environment. If they did, they wouldn't be trying to push this through. We have three members in our family with asthma and this project will jeopardize their health.	07/15/2024
	When we moved here we did not purchase in Superior because of the terrible reputation for foundation settling and instability. Now thousands of houses will be threatened with the same fate - plaguing home safety and property values. Erie does not want this dangerous reputation.  I implore you to reject the Draco project. Stay away from neighborhoods and schools. It's just common sense.	
	There are many reasons to oppose this drilling project. Here are just a few that I have found which should render this project denied. Thank you for your consideration and for providing this public comment opportunity.	07/15/2024
	There is inadequate air monitoring within the Draco drilling spacing unit (DSU) for a project of this size with this length of wellbores, nor is there any commitment to improving this in the Civitas plan.	
	The Colorado Energy and Carbon Management Commission (ECMC) should deny this project because it would subject nearby communities to hazardous air pollutants including nitrogen oxides, particulate matter, and benzene, and to the	

risk of spills, fires, and explosions from wells and pipelines. Our state government must reject the Draco Pad to meet its climate and environmental justice commitments.

?

Hundreds of Erie and Lafayette residents living near the proposed project have spoken out against the Draco Pad at public hearings and have submitted comments highlighting the deficits in the Civitas' application - it's time for the ECMC to listen and act on behalf of Colorado communities, not the fossil fuel industry.

?

The extraction company, Civitas has proven to not be a good community partner in Erie. This includes non-permitted drilling activity, nondisclosure of spills, and lack of dissemination of information therein. Most recent examples just within Erie include:

? The historic and unprecedented spill at Well 1-24 in the Country Meadows neighborhood, which is within the Draco drilling spacing unit.

? The discovery of a spill at the Arapahoe Well 2-25 in Arapahoe Ridge ? The discovery of a spill at the Wooley Well 22-7 in Morgan Hills

?

The planned Draco Pad project is in a Geohazard area including several old mines. A geohazard analysis prepared on behalf of Weld County states "The the northern edge of the Draco Pad is close to Eagle Mine room-and-pillar workings... The site is located within a mapped "severe" subsidence hazard area. Some of the proposed wells may encounter rubble zones and possible voids associated with the mine workings. The applicant should be made aware of the undermining and potential (but probably low) subsidence hazard in this area."

?

Erie is already the most directly impacted community in Colorado based on complaints made to the ECMC

(https://erieprotectors.com/2024/01/ecmc-complaints-analysis/).

?

Erie is one of the top ten fastest-growing towns in Colorado and projects an increase of 37% in the number of households from 2020-2028. Land developers and school districts have already purchased and submitted plans to develop this area. With current laws, developers are not required to disclose dangers after oil and gas extraction operations have already been started or completed and locations of schools are not considered until students are in the building. This is a deceptive practice and if construction is planned that would impact residents, this operation should not be allowed.

?

Fracking exposes nearby communities and adjacent regions to unsafe toxic emissions, including benzene, xylenes, and toluene. Fracking emissions have been shown by hundreds of peer-reviewed studies, such as those in the 9th Fracking Science Compendium, has incredibly adverse health effects.

?

Fracking emissions produce higher rates of cancer, respiratory illness, asthma, birth defects, premature birth, and low birth weight.

Health Effects On Children:

?

According to Dr. Ted Schettler, MD MPH, children within 5 miles of a fracking site are 4 times more likely to get cancer, and within 2 miles are 7 times as likely. Aspen Ridge Charter (K-8) and Meadowlark (PK-8) are directly within the planned drilling spacing unit. Red Hawk (PK-8), Highlands (PK-8), and Black Rock (PK-8) are within miles of the Pad. Emissions do not only affect immediate surrounding residences, as downwind regions experience higher rates of cancer than upwind regions.

?

The Draco Pad project will require 541,000,000 gallons of fresh water for each well which cannot be reused or recycled. The injection of chemicals for hydraulic fracturing makes the water highly toxic and unviable for consumption.

?

On July 11, 2024, Boulder County was updated to Severe Drought by the USDM.

?

Weld County is the largest user of water for fracking of any county in the country.

Approving this and adding to that unthinkable statistic is reckless and uncaring. Existing Wells:

?

28 wells within the planned drilling area are at great risk of being 'hit' with the proposed 26 wellbores. History has shown that improperly plugged and abandoned wells are a risk to the health and safety of the nearby communities, and two such instances have occurred within the county.

10 In 2008, two young parents moved from inner city Pittsburgh, Pennsylvania to Superior, Colorado for 6 a better life for their three young children, ages 8, 6, and 4.

07/15/2024

>>

The desire for better educational choices, open enrollment options, outdoor activities, and clean air were what the parents most wanted for their children.

>>

They had only visited Boulder County once, but when their home sold quickly, they didn't hesitate to head West.

>>

A friend had helped them locate a home in the Sagamore neighborhood of Superior where they were greeted by many other 'non-natives' who welcomed them wholeheartedly.

>>

Boulder Valley School District proved to be the answer the parents were looking for in providing their children with adaptive educational resources, after-school activities, and a robust parent volunteer network which the parents took full advantage of.

>>

The mom became a Girl Scout leader, and the dad a reading and writing tutor.

>>

In 2015 the opportunity came for a rent-to-own home in the Autumn Meadows neighborhood in the nearby town of Lafayette. While their landlord in Sagamore had become a good friend and hadn't raised their rent in 7 years, their research showed that Lafayette was a great town and would still provide access to the BVSD schools they'd come to love.

>>

For a year they settled into their new home and neighborhood, but an unfortunate turn of events occurred when a pending divorce resulted in the home not going up for sale.

>>

The family found themselves renting again in the Waneka Lake area of Lafayette, and for two years the family researched and saved to figure out their next best move.

>>

In 2018, an unexpected and fortuitous family inheritance allowed the young family to consider building their own home for their needs in a new neighborhood in Erie, called Flatiron Meadows. In fact, the amount of the inheritance was the exact amount needed for a down payment with the builder. It seemed too good to be true.

>>

Countless hours spent pouring over budgets and spreadsheets and financial advice from their parents showed that the dream of building and owning their own home was actually possible.

>>

The only concern they had was the well-known reputation of Erie as an oil and gas town. Half 'Wild Weld' and half 'Boulder Bubble', Erie seemed to be a town with an identity crisis. The possibility of oil and gas development in the area was enough for the family to consider not moving forward with their dream.

>>

After much consideration and research on the existing wells within the area and speaking with their new potential neighbors, the family decided to take the leap. Surely the fact that the home was on the Boulder side of Erie would provide some protection from the prevalent drilling on the Weld side.

>>

On March 4th, 2018 - the birthday of the family member who gave the inheritance - the family put down their deposit on the home.

>>

And, sure enough. In March 2019, SB19-181 was introduced and one month later signed by the Governor. The Boulder County moratorium soon followed and it seemed that the family's gamble had paid off.

>>

Arts Council boards and High school band boosters were joined. The three children thrived, and frankly so did the parents. Lifelong friendships were made with neighbors, and as the kids grew, they decided to go to state universities in Boulder and Fort Collins. Life was good.

On January 11, 2024, a neighbor posted on the Flatiron Meadows Facebook page that they had heard about a proposed oil and gas fracking operation, which would start in unincorporated Weld County and run 26 fracking wellbores five miles west through Boulder County and right under the family's home in Flatiron Meadows.

>>

How could this be true?

>>

But it was true.

>>

The mom got to work organizing and researching and calling and emailing and mobilizing.

>>

She reached out to community-building groups and local experts and other neighborhoods fighting similar operations in Aurora and Broomfield.

>>

The Facebook group Flatiron Meadows O&G Monitoring was created.

>>

On June 12th, a well-attended public meeting was held at the Erie Library with state elected officials and local politicians and environmental experts, and activists.

>>

She had many sleepless nights creating content, and writing politicians and council members, and looking for inconsistencies in the applications.

>>

The mom authored and launched the website www.StopDracoPad.com.

>>

She learned a whole new vocabulary around 'setbacks' and 'plug and abandon' and 'spud' and 'affected party status' and 'proximal governments' and 'denial criteria' and 'substantial equivalents' and 'mineral rights'.

>>

She learned many acronyms like 'ECMC' and 'OGDP' and 'DSU'.

>>

She learned firsthand about the ugly side of activism with gatekept information and cliquish antics.

>>

But she knew her goal and she knew her worth and she pressed on.

>>

Networks were rebuilt and she found her support expand and with the encouragement of many, she continued the fight.

>>

A neighbor who is also an Erie town councilperson mentioned that the ECMC appreciates public comments and reads them all and that that was probably the next best opportunity next to petitioning for a public hearing request.

>>

There was only one problem. By the time the mom heard about the public comment website, there were only 7 days left for public comments to be made.

>>

The mom posted to every Facebook group she could find.

>>

In every correspondence, she provided the list of facts that she had compiled. About environmental concerns, geohazard studies, and the amount of sand and water, and diesel fuel needed for the fracking project. And in every correspondence, a link to the ECMC public comment webpage a a please to write comments by July 17th.

>>

On July 7th there was only one public comment. By the last count today, there are over 70 comments.

>>

I know you're going to read them all.

>>

I know you've probably deduced that I am the mom and the family is mine.

>>

This is my story. This is the story that I tell anyone who will listen.

>>

And this story has never been only about me.

>>

This is the story of so many of my neighbors and the people who live in the 19 impacted neighborhoods.

>:

	This is the story of ensuring that Erie is a safe place to live for years to come.	
	This is a story of extraction giving the middle finger to towns and counties like Erie and Boulder who have taken the stance of people above profit.	
	This story is about doing the right thing.	
	>> Commissioners, there are simply too many unknowns with this project.	
	>> The geohazard study is incomplete.	
	>> The five-mile laterals are unprecedented with unknown risks.	
	>> The extraction company has made no attempt to provide timelines and transparency around its plugand-abandon plans.	
	The extraction company has not proven to be a good partner in Erie.	
	>> The amount of water they will need for this project is an abomination in our drought-ridden state.	
	I know they've checked the boxes. I know they have good lawyers. I know they know how to tell a good story.	
	>> This is not a good story to tell. Not for the residents of Erie. Not for the ECMC. Honestly, not even for Weld County.	
	>> I have much more research that I can and will share when given a chance to do so.	
	>> I ask you to please consider the risks grossly outweigh the rewards of this proposal.	
	>> Thank you for your time and consideration.	
10 7	As a homeowner in one of the impacted neighborhoods, I have serious reservations about this plan. There have been many comments that address some of the issues, such as lack of research and testing, immense water use, and the proximity to a highly populated area and public spaces. I strongly oppose this proposal.	07/15/2024
10 8	There is an active methane leak in Erie highlands being capped as this is being proposed, half a mile away. This is a public health nightmare to allow them to do to this near residential communities and schools. Oil and gas has shown time and time again they can't be trusted to protect the environment, there is no reason to jeopardize the health of an entire community. The benefits do not outweigh the risk, do not allow this to proceed!	07/15/2024
10 9	My reasons for concern include:  - The extraction company Civitas' own records show that they will use 541 million gallons of water that cannot be reused or recycled while Weld and Boulder are under severe drought warnings  - No transparent plan or timeline from Civitas for the plug and abandon operations of the 22 wells in the path of this project  - A poor track record for Civitas as a responsible extraction company in Erie  - No alignment from County and Civitas geological surveyors on the impact of drilling in a geohazard area (i.e old mines)  - Unprecedented and untested 5 mile long lateral well bores with unknown impacts in a highly populated area	07/15/2024
	At the very least, it feels reasonable that the Draco project be delayed until these impacts are better understood.	
110	I would like to lodge my extreme opposition to this plan as a resident of Erie in one of the MANY neighborhoods that will be impacted. This is an ill conceived and poorly researched excitement that we should not allow to happen. The impacts on our life, children and home values will be negative and detrimental.	07/16/2024
111	It's already been said here, but we should all be concerned about Civitas and their plans. First off, their track record in Erie isn't great, and they haven't provided a clear plan or timeline for closing all of the wells in the project's path. Plus, they're attempting an unprecedented 5-mile long lateral well bore in a densely populated area, and we have no idea what the effects will be. There's also disagreement between county and Civitas geological surveyors about the impact of drilling in a geohazard area with old mines. To top it all off, Civitas plans to use 541 million gallons of water that can't be reused or	07/16/2024

recycled, while the entire region is already dealing with severe droughts. I understand oil & gas are a necessary part of our lives, but this project needs put on hold indefinitely until we can better analyze and determine potential impacts, and have a better plan for the natural resources required to make this happen.	
As a homeowner directly in the path of this pipeline, I am concerned about the local impact of this plan. This pipeline covers most neighborhoods in Erie, and impacts almost the entire town. Based on my personal research, there's a high likelihood of damage to other wells, including oil leakage, toxic fumes, and significant water usage in a time of drought for this area. In addition, this will be built directly adjacent to neighborhoods, future school sites, and under existing homes.  Please do not approve this plan - this will have far-reaching impacts for decades to come and will	07/16/2024
significantly lower the quality of life in Erie.	
113 I'm writing to express my opposition to the Draco project. I'm especially concerned about the huge and permanent water use while drought throughout Colorado is a concern and about the unclear geological and health and safety impacts of these lateral bores, which pass below 19 different neighborhoods in Erie. This project seems poorly studied and poorly planned - for example, I can find no plan from Civitas on closure of existing wells in the paths of the lateral bores. Coloradans should not have to worry that a private entity might drill a potentially dangerous bore underneath their home with no warning or recourse.	07/16/2024
Inave major concerns about this project. It seems unwise to have horizontal drills of unprecedented lengths that go under so many homes when that distance has not been tested and the impacts are unknown. Weld and Boulder County already struggle with low water levels and drought conditions. The price of water in Erie is already extremely high in comparison to neighboring areas. The amount of water and impact on the surrounding areas seems it will be detrimental to homes and the community. Please reconsider this project for another less populated area or conduct extensive testing prior to its start. The long term impacts could be devastating	07/16/2024
115 I believe this project should be denied.	07/16/2024
Reasons for concern include:	
- The extraction company Civitas' own records show that they will use 541 million gallons of water that cannot be reused or recycled while Weld and Boulder are under severe drought warnings	
- No transparent plan or timeline from Civitas for the plug and abandon operations of the 22 wells in the path of this project	
- A poor track record for Civitas as a responsible extraction company in Erie	
- No alignment from County and Civitas geological surveyors on the impact of drilling in a geohazard area (i.e old mines)	
- Unprecedented and untested 5 mile long lateral well bores with unknown impacts in a highly populated area	
If the project is not to be denied in full at this time, at the very least it feels reasonable that the Draco project be delayed until these impacts are better understood.	
The idea of drilling horizontal lines in an unprecedented length across the majority of town is irresponsible and greedy. This plan has the potential to affect thousands of homes and families thruout Erie and without proof that this is safe and will not cause harm, damage, etc to our town, homes and family's is reckless. Our town is also built on old mines, how does this affect the stability of the ground our homes are built on? How does this affect our water sources? Please do not use our town and families as guinea pigs for this project.	07/16/2024
Please do not make the Lafayette/Erie area a test for this project. With the extensive system of old mine shafts and tunnels, this additional drilling could destabilize the land further while also contaminating our already limited water supply in the area.	07/16/2024
I have serious concerns about the water usage required for this well. Additionally, as a resident of Lafayette, I do not want my children breathing in the toxic waste. Let's choose our health and our planet over money. The powers that be in Erie who approved this project should be ashamed of themselves.	07/16/2024
119 It is absolutely unconscionable that you would consider using ANY water that cannot be reused for this misguided greedy project Please do not approve	07/16/2024

	As a homeowner directly in the path of this pipeline, I am concerned about the local impact of this plan. This pipeline covers most neighborhoods in Erie, and impacts almost the entire town. Based on my personal research, there's a high likelihood of damage to other wells, including oil leakage, toxic fumes, and significant water usage in a time of drought for this area. In addition, this will be built directly adjacent to neighborhoods, future school sites, and under existing homes. Please do not approve this plan	07/16/2024
	Water shortage, cost, droughts and unknown environmental and health impact should stop this nonsense.	07/16/2024
12 2	As a homeowner directly in the path of this pipeline, I am concerned about the local impact of this plan. This pipeline covers most neighborhoods in Erie, and impacts almost the entire town. Based on my personal research, there's a high likelihood of damage to other wells, including oil leakage, toxic fumes, and significant water usage in a time of drought for this area. In addition, this will be built directly adjacent to neighborhoods, future school sites, and under existing homes. Please do not approve this plan	07/16/2024
	I'm so tired of the land grab and how Erie says yes to everything What about US?! The people?! We don't want it This community is getting tighter and tighter with Erie building every square inch of land they have We need peace! We need to and deserve to be heard and our concerns ARE valid. There are so many unknowns and yet known health issues once these fracking sites pop up.	
1.5	Please stop the insanity	07/10/000
12   3	I live in one of the 18 neighborhoods that will be impacted by this plan in Erie.	07/16/2024
	I do not trust this project to be regulated or maintained. I can guarantee this project will have detrimental impacts to the surrounding geography, physical health of residents and environment.	
	The only purpose of this project is led by greed. I am disgusted that this is even being mulled over by our town. I bought my house 5 years ago looking to create a safe environment for my child to grow up in. Now I'm facing the prospect of damage to our land, home, and toxic effects on their physical health.	
	Do not let this project go any further.	
	When I read about the possible fracking under our homes, it was shocking to me and I couldn't believe it could be true. As a cancer survivor, I do my best to control the things I can and not have toxic items in our home. Now I hear that there could possibly be toxic fumes coming from underneath us. This is unacceptable and shouldn't be allowed to happen. I realize that fracking is something we have had to grow accustomed to here in Colorado, but not under people's homes.	07/16/2024
	Hello, my senior parents invested in a home in the affected area. I live just outside the highlighted affected area. My two children, 8 months and 2 years old, spend a lot of time at their grandparents home. I am incredibly concerned about the health impacts for both my senior parents and my tiny children. Additionally, it looks like the space affects all the growth area that Erie is working on all the new construction and business development. We spend most of our weekends in downtown Erie and attend many of the community events - including time spent at the community center and park. This would greatly impact my family, and I know there are easily thousands of others, especially new home owners who will be impacted by this. This is a terrible location for fracking. There are plenty of other areas that have less population and infrastructure investment that would be better suited. Please protect our children, our parents, our community, and our future in Erie. Thank you.	07/16/2024
	I am strongly opposed to the proposed Draco pad due to the proximity to homes, schools, parks, and farms. High pressure fracking in an already damaged area is dangerous and concerning for those involved. VOCs released will impact homes across the area, not just at the pad. This is highly concerning for a higher density residential area.	07/16/2024
	Only negative outcomes with this plan	07/16/2024
7	1 According to Drought.gov, 27.8% of CO state is in drought, with an estimated 426,800 residents. We need water for residents, not for corporate profits to make our drought worse. Erie has the highest water prices in the state, allowing this plan will only make water prices higher and water less available for residents and towns that need it most.	
	2 Places people and homes in danger - and lowers property values. I and many other residents	

	selected our home purchase based on location, where there are No O&G pipes or wells nearby. This plan not only places my family and home in harms way, but it will also devalue the properties, making them an undesirable by a large percent of buyers.	
	3 High potential for poisoning water sources and natural lands. The plan's 26 five mile runs are unsafe in every way. They would go under nearly every home, business, park, open space, water reservoirs, etc. in the town of Erie. When these leak (when, not if), they will leach into areas unknown, poisoning whatever it touches for thousands of years. Killing wildlife, plants, and likely poisoning the groundwater.	
	We request you reject the proposed plan, in its entirety. That is the only way to ensure safety of residents, now and in the future.	
	Please pause this immediately. There are so many unknown and unknown concerns.	07/16/2024
	Fracking near the local community of Lafayette and Erie would be incredibly concerning due to the potential health impacts on residents. The release of harmful chemicals and gases into the air and water supply could lead to respiratory issues, skin irritations, and long-term health problems for the community. Additionally, the environmental impacts of fracking, such as water contamination and air pollution, could harm local wildlife and ecosystems.	
	The excessive water usage required for fracking could strain local water resources in Lafayette, potentially leading to water shortages and impacting the availability of clean drinking water for residents. Overall, the risks associated with fracking in the local community are too great to ignore, and steps should be taken to prevent this harmful practice from occurring in residential areas.	
L	Please pause this immediately.	
	12 I am a resident of East Boulder County. New Fracking in such a densely populated area as is being proposed should NOT be allowed. The health and safety issues and the water use/waste issues are much too dangerous for all of us who live out here. Please, please, please take these important issues under consideration.	07/16/2024
	As a homeowner in the proposed area, I am incredibly opposed to this. Using 541 million gallons of water that cannot be reused or recycled while we are under severe drought warnings is irresponsible and short-sighted. This plan is also within a heavily residential area with new neighborhoods being built as we speak. Please do not approve this as it puts Erie residents at risk and provides no benefits to us, only the drilling company.	07/16/2024
	13 I am opposed to this project going forward for many reasons, with environmental issues being at the top.	07/16/2024
	As a home owner I oppose the Draco Project due to the environmental and health risk associated with the project, including the extreme water use during time of drought.	07/16/2024
	As a resident of a neighborhood in Erie near the path of these proposed operations, I am writing to express my strong opposition against the Draco pad, and ask that you deny this proposal. Not only do these proposed operations have a high likelihood of environmental impact, including damage to other wells, significant water usage in a time of drought, and hazardous air pollutants, but the public health risk is significant and disturbing. Since moving to Erie in 2018, we have personally known several neighbors, including children, who were diagnosed with rare cancers, as well as other neighbors that have significant, exacerbated asthma, emphysema and other health conditions that are correlated with air pollution. Civitas already has a poor track record as a responsible extraction company in Erie, and there is no assurance or alignment that they would consider health and safety foremost when adding additional operations. So I would implore you, please do not add additional health risks to those of us that already live in close proximity to fracking operations by approving this proposal. Some of the street signs in our neighborhood say, "Please drive slow, we love our children," and just as reckless driving can be a health hazard to our children, so can adding additional oil and gas operations that pose a significant detriment to their health and environment. Please do not approve this proposal; place the health of our children, environment, and community first!	07/16/2024

My opposition is twofold - the negative health risks it would exacerbate for my 5 year old grandchildren and my 7 year old great niece who live in Lafayette and the excessive and irresponsible use of scarce water resources which would be required in the drilling and fracking process. Ozone air pollution levels are already too high to protect public health and oil and gas production in the area is already a growing contributor to that unhealthy air pollution problem there in spite of industry efforts to reduce the impacts. Please don't add to it. As for the drain on unrecoverable water resources necessary for the fracking process please do factor into your environmental assessment the growing need for water resources to support the rapid current and anticipated growth in housing for the population explosion in the area. Thank you.	07/16/2024
For all the reasons already stated. No more fracking. Enough is enough.	07/16/2024
I strongly OPPOSE this negligent, ignorant, and greedy proposal that sacrifices health and resources and ultimately moneyhealthcare costs, resource costs, life costs for any and everyone living in this state!for the sole purpose of what is SEEN as immediate profit. The proposal clearly exposes the lack of information and planning this idea reflects both re: short-term and long-term impacts, and again, ultimately every single Coloradan will pay the price in health, resources, and life. PLEASE OPPOSE THIS MESS!	07/16/2024
As a resident of Erie in eastern Boulder County, I will be directly affected by this environmentally unsound proposal. Water is a precious commodity throughout Colorado, including along the Front Range. Civitas' own records show that they will use 541 million gallons of water that cannot be reused or recycled. Due to that fact alone, why is this proposal even being considered? It seems like an extraordinary waste of natural resources in the name of corporate greed. They will be drilling in a densely populated area, where the environmental impacts are also not clearly known. Fracking has been linked to pre-term births, high-risk pregnancies, asthma, migraine headaches, fatigue, nasal and sinus symptoms, and skin disorders over the last 10 years. Without rigorous safety regulations, it can poison groundwater, pollute surface water, emit greenhouse gases such as methane, release toxic air pollutants, impair wild landscapes, and threaten wildlife. Civitas has a poor track record as a responsible extraction company in Erie. There does not seem to be a transparent plan or timeline from Civitas for the plug and abandon operations of the 22 wells in the path of this project. What will be the impacts of drilling in a geohazard area? I do not believe that we can trust Civitas to safeguard our citizens. As a state regulatory body, your responsibility is to ensure the health and safety of Colorado residents. It would be irresponsible for the commission to allow this proposal to go ahead, given all the potential negative environmental consequences and the direct opposition of so many tax-paying residents who will be affected.	07/16/2024
For the unnecessary increase in risks to public health and the wasting of natural resources, this proposal should be denied immediately. As a resident of Lafayette, I expect strong consideration for public impact, and this proposal would do far more harm than good.	07/16/2024
Please do not move forward with the Draco Pad.  Here are some major issues: The extraction company Civitas' own records show that they will use 541 million gallons of water that cannot be reused or recycled while Weld and Boulder are under severe drought warnings  No transparent plan or timeline from Civitas for the plug and abandon operations of the 22 wells in the path of this project  The 28 total wells within the planned drilling area are at risk of being 'hit' with the proposed 26 wellbores. The risks of fracking so close to the 3 orphaned and abandoned wells in the Lafayette Kneebone open space are unknown.  It will subject nearby communities such as Lafayette to hazardous air pollutants and particulate matter and to the risk of spills, fires, and increased extraction traffic, pollution, and noise.  Unprecedented and untested 5 mile long lateral well bores with unknown impacts in a highly populated area  At the very least, it feels reasonable that the Draco project be delayed until these impacts are better understood	07/16/2024
14 I'm writing to urge decisionmakers to reject this Draco plan. The amount of water it will use is horrifying when water is such a critical resource and we have regular droughts. I've also heard negative things about Civitas and am not eager to have them doing this work in Erie. If this project is so vital, I urge you to take more time in order to do more research, so that we don't end up with disasters due to insufficient research and a lack of scientific consensus.	07/16/2024
Please reject the Draco Pad plan. From what I've learned about it, it's rushing forward without agreement from surveyors on the impact of this drilling in an area where LOTS of people live. I'm also worried about the massive amount of water that this will use when we need that water for other uses. Please reject!	07/16/2024
14 The number of reasons that this is a terrible plan is lengthy. As a resident of Lafayette and this state, I	07/16/2024
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2	am amazed and appalled that it has reached the point of possible acceptance. The amount of water use that cannot be reused/recycled should be enough, but the risk to our health and the environment due to probable increased air and water pollution (wells), possible accidents in a highly populated area- the list is long and these are only a few of the outcomes. I urge the Colorado Energy & Carbon Management Committee to reject this plan and protect the citizens and environment.	
	This is inexcusable particularly for the unreclaimed water use at a time when the future of available water is so uncertain. As an elderly resident of northeastern Lafayette the thought of worsening air quality is positively terrifying particularly when so many already rely on oxygen. 5 mile vertical drilling is also a huge concern for schools as well as public housing in the area. Please put a stop to this.	07/16/2024
	STOP DRACO The Fracking is too close to wells and homes. There is not enough testing. This will also use too much water and we are already in a drought. It will also pollute our air.	07/16/2024
	Kathy Sanford	
	I live in Lafayette, very near the border of these proposed wells. 9 years ago when I was hunting for a place to live, I purposely avoided Erie due to fracking. Now I find that fracking will be on my doorstep! I currently suffer from autoimmune issues that would easily be triggered by the pollutants these wells throw off. Please deny Draco and use common sense regarding the effect this will have on our precious water supplies.	07/16/2024
	For all the reasons already mentioned, I hope this project will not receive authorization to proceed and common sense prevails. It is a crime with the residents in Bulder County.	07/16/2024
	I am a homeowner in Erie, I oppose the Civitas/Draco Project. I have concerns about the environmental and health risks associated with the project. Additionally, I oppose the extreme water use during while in a drought.	07/16/2024
	I don't understand the need to drill this potentially danger, ground destabilizing project that has never been done before in a town under thousands of homes. And I truly don't understand how Weld County can approve this project in isolation when it impacts Boulder County and the Town of Erie. Who is going to cover the costs if this ends up causing settling issues for homeowners? I'm guessing the answer is we can't prove the fracking caused it so the homeowners will be left to foot the bill. Who is going to pay for the medical issues that we refuse to put the funding into studying that will likely be a result of drilling (air issues as well as all of the contamination in the ground and ground water). I don't understand why they need to test a never been done before process in this densely populated area. Weld County has plenty of open space. Go test further east in a farming area first. I live in Boulder County for several reasons and one of those is they are less likely to approve every single fracking contract that is submitted. This is irresponsible and the ramifications are far reaching and something we all know will never be owned up to or admitted to. Beyond the contamination issues, we are drilling under older wells which we have all witnessed can become issues if they weren't closed up correctly or if they become destabilized. This is greed, pure and simple. Please put a stop to this project and if these companies must test new ways of drilling, have them do it in open space areas, not in densely populated areas where they are causing harm (mentally, physically, and more).	07/16/2024
	It is 2024. We are well aware of the dangers & harm caused by oil & gas wells to people who live nearby. We have 100s of wells in Erie, and it is unconscionable that we could possible add another mega pad in our town. Every well that has been plugged has shown a legacy leak and active wells have uncontrolled emission events during their lifespan. The millions of gallons of water required never return to the hydrologic cycle. Please uphold your duty to health and safety.	07/16/2024
	Please reject the plan for the Draco Pad. Fracking can have severe impacts to the health of the local populous and the environment, and the approximately 541 million gallons of water that would be used for this project is an unfathomable waste of a limited resource in this part of Colorado. This project will have no positive benefits for the communities that will be drilled under. Please reject.	07/16/2024
15 1	I object to the Draco Oil and Gas Development proposal that will run a 5 mile long lateral wellborn under/near my house in the Boulder County part of Erie. Their proposal says it will use 541MILLION gallons of water which we don't have to waste as it will not be reclaimable. We are in a DROUGHT here. Draco has a poor track record as a responsible extraction company in Erie. And their proposal has no plan for plugging and abandonment operations for the 22 wells in the path of the project. Also Erie has many old mines between Draco's current operations and where they are proposing to put in the 5 mile long untested lateral well bores in a densely populated area. Please deny Draco's proposal.	07/16/2024

I am concerned with the amount of water that cannot be reused or recycled while we are under severe drought warnings.  There are many wells in the path of this project and there is no plan to plug them.  Could there be a problem due to geohazard area of old coal mines?  We live her and are concerned how this project will impact our property.  I hope the Colorado Energy & Carbon Management Commission consider this project's potential risks for people living in this area.  Thank you, Lenore Kingston	07/16/2024
Do not ruin Erie and the health of our citizens & wildlife with this unnecessary project. This will destroy the value of our community.	07/16/2024
How many spills and clean ups do we need to live though before we stop the drilling? We know its a problem. In addition, this puts our children at risk and our homes. Fracking causes groundwater contamination, seismic activity, air quality and water pollution, soil contamination, structural damage to buildings and houses, health risks, and property value decline.  Where will Civitas be when Erie becomes a Superfund clean up site? They'll be gone and the residents of Erie will be left with the mess. No. It's a hard no!	07/16/2024
Please reject the Draco fracking and do not let Civitas proceed with this project. This is going directly under our homes in several neighborhoods and will have a negative impact on our communities.  1. Civitas has not been shown to be a resposible extraction company in Erie. They do not have a well-planned timeline for plug-abandon of the 22 wells in the path of excavation.  2. 5-mile long of untested excavation in a highly populated area without knowing the environmental impacts of such drilling is risky.  3. Water is "gold" in Erie and to think that 541 million gallons will be used that we cannot resue of recyle is very concerning. Our water bills will be sky high in the future.  4. People and environment before profit!	07/16/2024
It is absolutely insane that after 20 years of countless reports nation wide about the health risks of fracking that the idiots in Weld County would approve this. Erie already has dozens of abandoned wells that are leaking. We don't need more. Just some of the health risks association with fracking, include low birth rate, higher congenital heart defects, respiratory issues, three types of asthma, fetal death, chronic rhinosinusitis, migraines. Not to mention the damage to the underground water table from the 1000 plus hazardous chemicals used in the process. We don't need to waste 541,000 gallons of water for this, that will become toxic. This can not be allowed to happen. The company has a track record of unsafe practices, fracking is known to harm the people around, above and near the wells.	07/16/2024
1. Water Usage and Scarcity: Civitas plans to use an immense 541 million gallons of water, which cannot be reused or recycled. This is highly concerning given the ongoing severe drought conditions in Boulder and Weld County, putting additional strain on already limited water resources. This alone should be grounds for rejection of this project. Also Civitas does not have a good track record.  2. Environmental and Health Risks: There are severe warnings about the potential contamination of water and soil, as well as air pollution from fracking activities. The presence of old mines and untested lateral wells increases the risk of unforeseen consequences, including seismic activity, chemical leaks and fire. Our community has already been negatively impacted by the recent Marshall fire.  3. Property and Infrastructure Concerns: The proximity of the proposed fracking sites to residential areas poses a direct threat to homes and community infrastructure. The unknown impacts of horizontal drilling beneath homes could lead to significant property damage and devaluation.  4. Lack of Proper Planning and Testing: There is no clear alignment or comprehensive study from the involved companies and geological surveyors to assess the full impact of the project. At this time there is no geo hazard plan that is provided. Extensive testing and thorough impact assessments should be conducted prior to any approval. Also there is no plan timeline from Civitas for the plug and abandon operations of the 22 wells.  5. Public Safety and Quality of Life: The project's potential to cause long-term health and safety issues for residents, including increased noise, air, and water pollution, makes it unsuitable for such a densely populated area. Erie's quality of life and property values are at significant risk.  Given these substantial concerns, I urge The Colorado Energy and Carbon Management Commission (ECMC) to disapprove the Draco fracking project. It is imperative to prioritize the well-being and safety	07/16/2024
, and and saidy	

15 This is unacceptable, the fracking needs to stop especially when it involves people's homes and the 8 water supply. Not to mention the horribly irresponsible and unjustified waste of water when that could be used elsewhere. I do not approve of this and don't understand why this would ever get approved, but let me guess, money. Big oil and gas have too much power and need to be stopped before the harm to our environment becomes irreparable. This is completely unnecessary and immoral, please see reason and reject this.  15 I am a resident of Erie (Boulder County) and writing to express my deep opposition to the Draco 9 (fracking project. Several members of my lamily suffer from sever environmental allergies exacerbated by fracking activities. Civitas plans to use an enormous amount of water - 451 million gallons of water to be exact according to their site, which cannot be reused or recycled, exacerbating the severe drought conditions in Boulder and Weld County. Civitas's poor track record further intensifies these concerns. There are serious warnings about potential contamination of water and sol, as well as an ipollution from fracking activities. The presence of oid mines and untested lateral wells increases the risk of unforeseen consequences, including seismic activity, chemical leaks, and fires. Our community is still recovering from the traum of Marshall Fire, and additional risks from fracking would be devastating. The proximity of the proposed fracking sites to residential areas and schools posses a direct threat to homes and community in fratteruture, with unknown impacts of the project. Currently, there is no provided geobazard plan, nor a clear timeline from Civitas for the puly and abandon operations of the 22 wells. It is only logical that extensive testing and thorough impact assessments should have been conducted and provided for public review prior to any approval. The project's potential to cause long-term health and safety issues for residents, including increased noise, air, and water pollut	of our community.	
9 fracking project. Several members of my family suffer from severe environmental allergies exacerbated by fracking activities. Civitas plans to use an enormous amount of water - 641 million gallons of water to be exact according to their site, which cannot be reused or recycled, exacerbating the severe drought conditions in Boulder and Weld County. Civitas's poor track record further intensifies these concerns. There are serious warnings about potential contamination of water and soll, as well as air politoin from fracking activities. The presence of old mines and untested lateral wells increases the risk of unforeseen consequences, including seismic activity, chemical leaks, and fires. Our community is still recovering from the trauma of Marshall Fire, and additional risks from fracking would be devastating. The proximity of the proposed fracking sites to residential areas and schools poses a direct threat to homes and community intrastructure, with unknown impacts of horizontal drilling potentially leading to significant property damage and devaluation. There is no clear alignment or comprehensive study from Civitas and geological surveyors to assess the full impact of the project. Currently, there is no provided geohazard plan, nor a clear timeline from Civitas for the plug and abandon operations of the 22 wells. It is only logical that extensive testing and thorough impact assessments should have been conducted and provided for public review prior to any approval. The project's potential to cause long-term health and safety issues for residents, including increased noise, air, and water pollution, makes it unsuitable for such a densely populated area, particularly for individuals with severe environmental allergies, whose health could be significantly compromised. The community's quality of life and properly values are also at significantly is common in the project of the project of the project of the project of the county of the project of the pr	8 water supply. Not to mention the horribly irresponsible and unjustified waste of water when that cobe used elsewhere. I do not approve of this and don't understand why this would ever get approve but let me guess, money. Big oil and gas have too much power and need to be stopped before the harm to our environment becomes irreparable. This is completely unnecessary and immoral, please	ould ed, e
Civitas' form 2A. • The most glaring error: The geologist certifying the map only mentions one of the coal mines within the initial, closer-zoom map area despite the presence of FIVE mine markers as indicated by the legend (there are two mines inside the 1 mile radius.) • The first map is zoomed in past the coal mine data source's allowed limit of 1:24,000. • There is a better, more precise source for the coal mine data at https://pubs.usgs.gov/imap/i-2735/i-2735.pdf. Given the certifying geologist's statement of depth, he had to have referred to that data source. But the map submitted to the state lacks important detail, such as depth, position of well shafts and fault lines. In other words, the geologist employed by Civitas knew there was better data but chose to submit incomplete data to the state. • Although the legend shows how a fault line would be represented, fault lines within the map area, as indicated on the better mine source data (link above), are not shown. Perhaps this is why the better map was not used? • "Distance to nearest coal mine undermine area" is not indicated. • "Distance to nearest collapsible soil area" is not indicated. • "Distance to nearest collapsible soil area" is not indicated. • "Distance to nearest collapsible soil area" is not indicated to be zoomed out to show "the extent of that hazard in relation to the proposed Oil and Gas Location" but the 2nd map has four indicators, each says "Hazard continues xxx", where "xxx" is replaced with North, South, East and West and an arrow is added to show the direction indicated. Clearly, the regulation requirements were not met Taken as a whole, these problems indicate a laxity on the part of the geologist who certified the map as well as a laxity on the part of the state employee who accepted it  In addition, the map legend has a representation for "earthquakes." I would like to point out:  • If there had been a dot representing "earthquake", this presumably would have indicated the location of the epicenter? How would shaking	9 fracking project. Several members of my family suffer from severe environmental allergies exacerbated by fracking activities. Civitas plans to use an enormous amount of water - 541 million gallons of water to be exact according to their site, which cannot be reused or recycled, exacerbat the severe drought conditions in Boulder and Weld County. Civitas's poor track record further intensifies these concerns. There are serious warnings about potential contamination of water and soil, as well as air pollution from fracking activities. The presence of old mines and untested latera wells increases the risk of unforeseen consequences, including seismic activity, chemical leaks, a fires. Our community is still recovering from the trauma of Marshall Fire, and additional risks from fracking would be devastating. The proximity of the proposed fracking sites to residential areas an schools poses a direct threat to homes and community infrastructure, with unknown impacts of horizontal drilling potentially leading to significant property damage and devaluation. There is no calignment or comprehensive study from Civitas and geological surveyors to assess the full impact the project. Currently, there is no provided geohazard plan, nor a clear timeline from Civitas for the plug and abandon operations of the 22 wells. It is only logical that extensive testing and thorough impact assessments should have been conducted and provided for public review prior to any approval. The project's potential to cause long-term health and safety issues for residents, includir increased noise, air, and water pollution, makes it unsuitable for such a densely populated area, particularly for individuals with severe environmental allergies, whose health could be significantly compromised. The community's quality of life and property values are also at significant risk. Give these substantial concerns, I strongly urge the Colorado Energy and Carbon Management Commission (ECMC) to disapprove the Draco fracking project. It is imperative to prioriti	ting d d d dear of e
<ul> <li>1 this oil and gas extraction site will impact our air quality and use an appalling amount of water that will not be available to be reused or recycled. Erie citizens in both Boulder and Weld counties should be concerned! Please stop Draco from happening!</li> <li>16 Generally, fracking is bad news for Erie. Fracking is the cause of our record-breaking poor air quality (and we don't have adequate air monitoring in the Draco area), it's a fire and explosive event hazard (there are 28 existing wells in the proposed drilling area). Noise levels are obnoxious to those living</li> </ul>	O Civitas' form 2A. • The most glaring error: The geologist certifying the map only mentions one of the coal mines within the initial, closer-zoom map area despite the presence of FIVE mine markers as indicated by the legend (there are two mines inside the 1 mile radius.) • The first map is zoomed in past the coal mine data source's allowed limit of 1:24,000. • There is a better, more precise source the coal mine data at https://pubs.usgs.gov/imap/i-2735/i-2735.pdf . Given the certifying geologist' statement of depth, he had to have referred to that data source. But the map submitted to the stat lacks important detail, such as depth, position of well shafts and fault lines. In other words, the geologist employed by Civitas knew there was better data but chose to submit incomplete data to state. • Although the legend shows how a fault line would be represented, fault lines within the ma area, as indicated on the better mine source data (link above), are not shown. Perhaps this is why better map was not used? • "Distance to nearest coal mine undermine area" is not indicated. • "Distance to nearest collapsible soil area" is not indicated. • According to regulation 304.b.(7) I, the second map is required to be zoomed out to show "the exof that hazard in relation to the proposed Oil and Gas Location" but the 2nd map has four indicate each says "Hazard continues xxx", where "xxx" is replaced with North, South, East and West and arrow is added to show the direction indicated. Clearly, the regulation requirements were not met. Taken as a whole, these problems indicate a laxity on the part of the geologist who certified the mas well as a laxity on the part of the state employee who accepted it  In addition, the map legend has a representation for "earthquakes." I would like to point out:  • If there had been a dot representing "earthquake", this presumably would have indicated the loca of the epicenter? How would shaking detectable in the area of the mines — a very important piece	the protection cation
Generally, fracking is bad news for Erie. Fracking is the cause of our record-breaking poor air quality (and we don't have adequate air monitoring in the Draco area), it's a fire and explosive event hazard (there are 28 existing wells in the proposed drilling area). Noise levels are obnoxious to those living	How did this get Draco Pad get approved? It will be 19.5 miles wide! While outside of the city limit this oil and gas extraction site will impact our air quality and use an appalling amount of water that not be available to be reused or recycled. Erie citizens in both Boulder and Weld counties should lead to be reused or recycled.	t will
	Generally, fracking is bad news for Erie. Fracking is the cause of our record-breaking poor air qua (and we don't have adequate air monitoring in the Draco area), it's a fire and explosive event haza (there are 28 existing wells in the proposed drilling area). Noise levels are obnoxious to those livin	ard

	Civitas Resources has been negligent in the past as demonstrated by practices such as non-permitted drilling activity and nondisclosure of spills. These are illegal practices. They plan to drill in areas peppered by old mine shafts and riven by fault lines. Have they performed due diligence by performing the geo-engineering analysis that proves their activities are safe? The public needs to see that. The public's safety needs to come first!	
	This is a very dangerous and highly polluting project that is not right for this area with all the potential issues unknown. Please put this project on the back burner for all of our health and safety. Kathryn Novak, Arapahoe Ridge	07/16/2024
	As an Erie resident with my growing family, I 100% disagree with this proposal. The reason I chose my neighborhood and my house is to avoid issues like these. Let's remember who we're putting at risk here, if not us, but our children. We live in Colorado where supposedly a healthier lifestyle is what we value, let's remember that as we decide on items such as these that can impact our community and our future greatly.	07/16/2024
	Please don't let this happen. I am a home owner in Erie and I'm very concerned. Fracking poses significant risks to our community, including potential contamination of ground water, which could jeopardize drinking water supply. The process releases harmful chemicals and methane, contributing to air pollution and climate change.  This is unnecessary to put so many people, including children and unborn children at risk. So please do not add additional health risks to those of us that live in the proposed area. Please reject the Draco pad	07/16/2024
16 6	We don't support this. It's damaging to the eco system and water ways.	07/16/2024
	I find this practice abhorrent. Weld county gets revenue from the frackers while Boulder county gets nothing, as far as I know. The water that frackers use is GONE. To the best of my knowledge we have global warming/climate change and dwindling water supplies. I think people need water more than frackers. Please do not approve this permit!	07/16/2024
16 8	This is very much unwanted. Please do all you can to prevent this.	07/16/2024
16 9	There are many reasons I am opposed to this proposal, but foremost in my mind is safety. This proposal is in a treacherous place with many existing or abandoned wells (this is strike one). That is bad enough, but it is also coincident with where a large number of people live, work, and go to school (strike two). It consumes a precious resource (water) that is increasingly scarce (strike three). I urge the ECMC to toss this proposal out of the ballpark.	07/16/2024
	STOP DRACO PAD NOW BEFORE IT KILLS OUR KIDS AND RUINS LIVES! IT'S OUTRAGEOUS THAT WELD COUNTY CAN RECKLESSLY ENDANGER BOULDER COUNTY WITH THIS DISASTROUS PROJECT. WASTING 541 MILLION GALLONS OF WATER DURING A SEVERE DROUGHT AND THREATENING OUR COMMUNITY'S HEALTH IS UNACCEPTABLE. CIVITAS'S NEGLIGENCE AND ABYSMAL TRACK RECORD PUT EVERYONE AT RISK, WITH UNTESTED DRILLING CAUSING CATASTROPHIC CONSEQUENCES IN A HIGHLY POPULATED AREA.	07/16/2024
17 1	How can this go ahead without input from Boulder Country which will be affected by the decision.	07/16/2024
	Please at least delay this project until the true impact can be determined. Boulder county is already in a severe drought. The use of that much water when we're unclear of how dangerous this will be and how much damage it will cause to wells and home is completely asinine. Stop the greed.	07/16/2024
17 3	Adamantly opposed for negative health and environmental implications.	07/16/2024
	There are so many reasons to deny the Draco pad. I will list a few. Civitas has shown time and time	07/16/2024

17   In wowed to Boulder County decades ago to enjoy the environment and quality of life. The DRACO   67/16/2024   5 project is irresponsible and unnecessary, it presents a severe negative impact on already stretched water resources and on air and noise quality. It also presents irrevocable risk to existing wells. Colorado should be taking the lead to put limitations on fracking, and instead make significant changes to move to alternative energy resources. Please stop this project!  17 I am writing to express my deep concerns regarding the proposed drilling for oil and gas underneath of un relighborhoods in Erie. There are several critical reasons why this approach poses significant risks to the safety and well-being of residents:  1. Environmental Risks: Drilling operations can lead to groundwater contamination, air pollution from methers and volatile organic compounds (VOCs), and rabbitat disruption. These pollutants have serious health implications, including respiratory problems and potential long-term health risks.  2. Earthquake Risks: Hydraulic fracturing (fracking) and wastewater injection can induce seismic activity, increasing the risk of earthquakes in otherwise stable areas. This can damage infrastructure and pose a direct threat to residents.  3. Safety Concerns: The proximity of drilling sites to residential areas raises concerns about explosions, leaks, and fires, which can have catastrophic consequences for nearby homes and families.  4. Quality of Life: Noise, light pollution, and increased heavy traffic associated with drilling operations can significantly diminish the quality of life for residents over short-term economic gains. Alternative energy sources and sustainable development practices can provide viable solutions without endangering our community.  17 The unprecedented scope of this project is experimental at best with many definite threats to the population in the Boulder, fire and surrounding areas. Water is a precious resource at this point in time already and wanton disregard of			
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	At the very least, it feels reasonable that the Draco project be delayed until these impacts are better understood.	
1	With the current state of drought and ozone pollution in Boulder and Weld counties, it would be irresponsible to move forward with fracking projects that would worsen water availability and air pollution for citizens while transferring wealth and resources to a private corporation.	07/16/2024
2	The risks far outweigh the benefits of allowing this drill project to move forward. The long term impact this site will leave if approved is dangerous to the community and environment. There is no clear outline to minimize risks to those impacted both during and after this dig operation - what about clean up?! There is also no need for this project to occur where outlined - go find somewhere else with less of a risk factor or better yet start investing in more environmentally responsible practices. This is NOT the town of Erie or Boulder County we chose to live in or were promised would not be impacted by drill sites. THIS NEEDS TO BE STOPPED!	07/16/2024
	As a nearby home owner, I oppose the Draco Project due to the environmental and health risk associated with the project, including the extreme water use during time of drought.	07/16/2024
4	Commenting to express my opposition to the proposed plan, as a Lafayette resident, I have concerns about air quality and unintended consequences of the fracking operations. This operation is too close to homes and has not been properly studied.	07/16/2024
5	Please do not fold to Draco's Fracking project that has a history of ignoring the health and well being of the community. Fracking so close to any community poses risks, many of which do not come to light until years later. Not to mention that is a disaster to wildlife and the land itself.	07/16/2024
6	Please do no allow this project to go through as designed and planned. I won't restate all of the comments that others have made here, but will add my own thoughts about this project. This feels to me like another case of the moneyed interests essentially running roughshod over the needs and desires of the people living above where the 26 horizontal lines will be going. This forum will generate plenty of comments from concerned citizens, but I wonder if it will really indicate the amount of disapproval and anger that going through with the project will incur among those citizens - I seriously doubt it. I think that the "business as usual" planners, extraction companies, and certification boards probably have little or no idea about the level of frustration and anger that these kinds of projects generate. This proposed project will endanger the health, welfare, and lives of everyone who will be living above those pipelines. And, to add insult to injury, all of us in the affected areas will undoubtedly see a devaluation of property values, and when that happens, I foresee a class action suit to recoup those losses, as well as recompense for threats to life and health. Please think carefully about this, because I think that you might find that choosing an alternate location, away from population centers, will be advisable.	07/16/2024
7	If I wanted to live with the impacts and dangers of Fracking and other O&G activities, I could have bought a much cheaper house in Weld County - but I chose to avoid those town specifically because they are happy to allow all of that. Please don't let this company bring that mess to me here, creating both known and unknown environmental and health impacts, AND a guaranteed drop in home values. We just got here and really can't afford that.	07/16/2024
8	I strongly oppose the Draco Pad proposal by Extraction Oil & Gas Inc. due to the significant environmental and health risks it poses. The project would consume an enormous amount of water in an already drought-prone area and potentially contaminate local water sources. The proximity to residential areas raises concerns about air and noise pollution, as well as the potential for accidents. It's imperative to prioritize the health and safety of our communities and environment over the interests of the oil and gas industry. Please reject this proposal.	07/16/2024
9	I am deeply concerned about the Draco Pad proposal by Extraction Oil & Gas Inc. due to the planned pipelines running directly under my home and community. This poses severe risks, including potential leaks and explosions, which could endanger the lives and safety of residents. The threat to our property values, the environment, and our peace of mind cannot be overstated. It's essential to prioritize the well-being of our community over industrial interests. Please reject this proposal to ensure our safety and preserve our neighborhood.	07/16/2024
0	We are stewards of our communities and the land we live on. It is our responsibility to ensure that our children and our children's children can live healthy lives in this community for generations to come. This proposed plan is not only dangerous; it is also short-sighted. And it's a bad deal for Colorado families. We can do better, and we must. Please do not pass this proposal. Thank you for your consideration.	07/16/2024
	Do not allow this plan to go through. Terrible pollution for our environment! We still have to live here and breathe here.	07/16/2024

	With the abundant need of water for this project and the lack of transparency in every aspect of how to protect the citizens in the planned drilling footprint, please say no to the Draco project, thank you.	07/16/2024
3	There are so many unknowns in this proposal, like the impact on abandoned fracking sites nearby, impacts of fracking on the environment and the enormous amount of water necessary to carry out the process. Oh yes, not to mention that all that water is wasted, not recycled. Really bad plan to propose such a project with so little data; seems like someone is trying to get this approved quickly so people can't delay their plans! Transparency, people!!!	07/16/2024
4	Stop this crazy idea. Our water and land should not be taken to support out of state companies and foreign developers. The money created does not benefit Colorado nor does it replace our water and restore the land.	07/17/2024
5	<ul> <li>The extraction company Civitas' records show that they will use 541 million gallons of water that cannot be reused or recycled while Weld and Boulder are under severe drought warnings</li> <li>No transparent plan or timeline from Civitas for the plug-and-abandon operations of the 22 wells in the path of this project</li> <li>The 28 total wells within the planned drilling area are at risk of being 'hit' with the proposed 26 wellbores. The risks of fracking so close to the 3 orphaned and abandoned wells in the Lafayette Kneebone open space are unknown.</li> <li>It will subject nearby communities such as Lafayette to hazardous air pollutants and particulate matter and the risk of spills, fires, increased extraction traffic, pollution, and noise.</li> <li>No alignment from County and Civitas geological surveyors on the impact of drilling in a geohazard area (i.e old mines)</li> <li>Unprecedented and untested 5-mile-long lateral well bores with unknown impacts in a highly populated area</li> </ul>	07/17/2024
19 6	We are opposed to any fracking in Boulder County because of the following; The extraction company Civitas' records show that they will use 541 million gallons of water that cannot be reused or recycled while Weld and Boulder are under severe drought warnings - No transparent plan or timeline from Civitas for the plug-and-abandon operations of the 22 wells in the path of this project - The 28 total wells within the planned drilling area are at risk of being 'hit' with the proposed 26 wellbores. The risks of fracking so close to the 3 orphaned and abandoned wells in the Lafayette Kneebone open space are unknown It will subject nearby communities such as Lafayette to hazardous air pollutants and particulate matter and the risk of spills, fires, increased extraction traffic, pollution, and noise No alignment from County and Civitas geological surveyors on the impact of drilling in a geohazard area (i.e old mines) - Unprecedented and untested 5-mile-long lateral well bores with unknown impacts in a highly populated area	07/17/2024
	No fracking! Pollution makes the air hazardous! The water requirements are ridiculous during a drought.	07/17/2024
8	A 5 mile later bore under such a high density of population is irresponsible to unheard-of levels. Please do not allow this to occur. Our property values will diminish significantly. The volume of unrecoverable water is ridiculous in a time where water is far more valuable than fossil fuel. The potential damage to our environment in a time where we already are deluged with bad air alerts is unacceptable.	07/17/2024
19	The area is too populated for this type of experiment. No on this well and experimental fracking.	07/17/2024
	No to the Draco project. I object to it. Too much water would be used. Too many pollutants would be produced. The air quality would suffer. NO!	07/17/2024
1	We are opposed to any fracking in Boulder County because of the following; The extraction company Civitas' records show that they will use 541 million gallons of water that cannot be reused or recycled while Weld and Boulder are under severe drought warnings - No transparent plan or timeline from Civitas for the plug-and-abandon operations of the 22 wells in the path of this project - The 28 total wells within the planned drilling area are at risk of being 'hit' with the proposed 26 wellbores. The risks of fracking so close to the 3 orphaned and abandoned wells in the Lafayette Kneebone open space are unknown It will subject nearby communities such as Lafayette to hazardous air pollutants and particulate matter and the risk of spills, fires, increased extraction traffic, pollution, and noise No alignment from County and Civitas geological surveyors on the impact of drilling in a geohazard area (i.e old mines) - Unprecedented and untested 5-mile-long lateral well bores with unknown impacts in a highly populated area.	07/17/2024
	Our community does not have the 'extra' water to support this venture. And the lateral drilling under populated areas is very concerning - especially given all the old mines.	07/17/2024
3	A fracking site of this size and scope belongs no where near any residential areas in my opinion - It is putting the health and safety of everyone around it at risk. As someone who was contemplating a move to the northeastern part of Erie, this is a deal breaker for me. Please vote no on Draco!	07/17/2024

l've enjoyed living in CO for the last 25 years. Over the years I've lived here I've witnessed some not so enjoyable changes along with the growth. 25 years ago if you were in certain places in the mountains, you could see almost as far as Kansas on a clear morning. Now we never have such clear mornings, no more sunrises that seem to last forever from that mountain vantage point. The "brown cloud" that used to just be a thin grey line over Denver is now a giant blob of pollution that encompasses the entire front range corridor. It seems to never dissipate anymore. Our air quality is often in question. Certainly we don't need to add any more particulates to the air around here! Not to mention the noise disruptions, added congestion in the road ways and all the other negatives that come along with a big fracking project.	07/17/2024
In my and my families opinion, this large fracking project, with Civitas as the driving benefactor, has no place near residential areas. we live in country Fields in Boulder County and have had nearly a year of prolonged cleanup, lack of testing, and unprotected barriers where my kids have wandered into toxic soil to play. Civitas has a very poor record of communicating w the nearby residents let alone being transparent about their work.  Please protect your taxpaying citizens from this for-profit company	07/17/2024
Please stop this project and protect our neighborhood and our families from more pollutants.	07/17/2024
The kind of water usage this project requires during drought and fire conditions is alarming. Insurers have been fleeing Colorado, driving at the cost of homeowners policies and triggering frequent cancellations for any claim, and this project add insult to injury by reducing water needed to respond to fire conditions. Erie and Weld county have no backup water supply anywhere near this area, further impacting the need for all freshwater to go toward the people who live in this area and fire teams. To add to this, those of us who live in the areas have experienced increased allergy suffering the past few years — fracking (common in Weld County and Thornton especially) has been proven to impact air quality and allergies, dangerously so for those with asthma and other respiratory conditions.	07/17/2024
This is inappropriate to put so close to neighborhoods and schools, especially without a plan for the water to be reused and recycled when drought is not a passing phase - but an increasing reality of climate change. We can do better to put a solar farm here rather than continuing to invest in non-renewable resources as a band-aid approach.	
Protect people from corporate greed. Protect essential water resources. There's too much risk.	07/17/2024
Too close to people, stop this fracking in boulder and weld counties. Strongly opposed.	07/17/2024
This would be a reason to leave the area. The air quality here is already worse than a lot of other places in Colorado, why risk everyone's health	07/17/2024
I moved to Lafayette to avoid fracking that is so common in Broomfield and Weld counties. This would make Lafayette a less valuable place to live.	07/17/2024
We chose to live in Lafayette instead of surrounding cities like Erie and Broomfield specifically because we wanted to be in Boulder County where fracking and drilling was not an issue. We have a young family, and the health issues this could cause is of great concern. This would be a reason for us to consider moving to another location.	07/17/2024
21 I've lost count on the number of high ozone days so far this summer. Not only are volatile organic compounds and nitrogen oxides released from wellpads, but hazardous air pollutants too - so close to people old, young and in between. I worked with the FLIR thermal infrared camera for years and have witnessed the inevitable gaseous leaks and venting. I urge ECMC to decline this project.	07/17/2024
Our air quality is already bad and the addition of fracking pollution can only make it worse. These five mile bores are also not well understood. How do they avoid abandoned wells and other objects. This project should be investigated further before any work starts.	07/17/2024
This fracking/drilling absolutely cannot be allowed! Our children's health is too important to be jeopardized by a company looking to make a profit. The proposed area is full of young families, elementary schools, daycares, and parks. This absolutely must not be allowed to happen in our neighborhoods.	07/17/2024
Our town and area already lack sufficient potable water to support our growing population. The risks to homeowners from explosions (Firestone, anyone?) and earthquakes (Oklahoma, anyone?) is a negative externality risk that families will have to shoulder, with no help or recourse from Civitas. The decrease in air quality will be criminal—no more resource extraction to the benefit of large out-of-state investors at the detriment and expense of locals.	07/17/2024
Decision makers, if you won't think of your own health, think of your kids and grandchildren's future as they breathe our worsening air.	07/17/2024

21 In any sort of environmental project that potentially impacts neighboring communities, let alone the communities in which they are placed, consideration must be given to potential ill effects, as well as notification given and a chance to make comment. I suppose this forum is the chance for comment, but living within an area of potential impact, it's simply unconscionable that I had to learn about this project from social media.	07/17/2024
Obviously we all drive cars and have energy requirements. Weld County is a county with a substantial area, yet somehow it seems advisable that drilling pads are put in close proximity to residential areas, parks, and schools. This cannot be the only way to meet our energy needs as a nation (and given the surplus of energy being produced, one questions whether this project is necessary, at all). Profit cannot be the sole determining motive for projects like this. A pittance of energy will be derived, but the potential lifetime harm of the project on all of those individuals who surround it and do not have the luxury of vacating their homes is forever. There is no driving force that requires this. There are a multitude of other options to achieve the same end, with less harm done to the community.	
21 As a current resident of Erie, I strongly oppose the proposed Draco Pad operation for the following reasons: 1. The operation is unprecedented and the first of its kind- five-mile horizontal well bores. There is no way to know the true impact and risks involved 2. Civitas has a horrible track record, and lacks honesty and transparency 3. The unknown impact on 19 neighborhoods, and SCHOOLS. 4. Health Risks- Oil and gas wells release harmful toxins and pollutants into our air and water. 5. The unknown risk of interference with abandoned wells. 6. I'm concerned about the high risk of spills as there are 26 lines each 5 miles. 7. Wasting 54 million gallons of water when our state is in a serve drought. Do what is right for the people who live in and near the communities that would be affected. Say NO TO DRACO.	07/17/2024
Please say no to the proposed Draco fracking site by Extraction Oil and Gas. As many others point out the risk to health, the environment, and the outrageous amount of water required to frack is not warranted. This drilling must not be allowed. The lack of public notification is glaring, I learned about this only today.	07/17/2024
The range of this drilling will go under almost ALL of the residential neighborhoods in Erie. It will pass through an area that has over 20 producing wells, and over 20 plugged and abandoned wells. The plugged and abandoned wells behind my house were plugged 30 years ago. We are already seeing old P&A wells starting to leak. Who will be responsible if the vibrations from the Draco well-bores start causing problems with the existing wells, and we start getting oil spills in our neighborhoods?	07/17/2024
We were under the impression Boulder County doesn't allow this type of drilling. We already have so many Ozone days, I don't get to leave my house often. I have serious lung issues. The dust, water usage, the noise, will substantially impact us. We work from home and the noise will impact our ability to earn an income. Please don't shrug this off.	07/17/2024
There doesn't seem to be any provision for environmental monitoring particularly along the horizontals/laterals and no penalties for violations. Hazards exist at the surface and subsurface during implementation and for long times afterward. We cannot tolerate these obvious risks under and around our homes.	07/17/2024
22 According to the American Petroleum Institute, "the average fracking job uses roughly 4 million gallons of water per well." This year, the Colorado River Basin is expected to have a Tier 1 water shortage - a reduction of 512,000 acre-feet due to drought, hotter and drier conditions and climate change. Given these facts, setting up another fracking operation in Colorado is short-sighted and outrageous.	07/17/2024
22 I oppose the draco pad and drilling. Please do not build it there 5	07/17/2024
22 I don't understand how this is still legal. Why on earth are we willing to trade our health and our lives this way, in a residential area no less. I strongly oppose this fracking initiative.	07/17/2024
This area is filled with young families. Please say no to the proposed fracking projects and the health and environmental risks that come with them.	07/17/2024
There has been no outreach to affected communities. Weld County and Boulder County are suffering significant drought. We have wild fire threats. This is a densely populated area. Stop this project.	07/17/2024
22 Erie has 20 sq miles of land. That's 557 million square feet. So we're talking about ~1 gallon of water 9 per square foot of land in Erie. That's 1.6 inches of water and we get 10-15 inches of rain a year.	07/17/2024
The paths for the 26 new well bores looks like an absolute disaster for the residents of Erie. I can't imagine ever proposing such an invasive project, to propose new well bores directly beneath hundreds of established homes impacting thousands of residents? Who in their right mind would propose such an invasive project, and who in their right mind would approve it?	07/17/2024
23 I would like to formally submit my comment against the Draco Fracking oil & gas project.	07/17/2024

Fracking, or hydraulic fracturing, is a method used to extract natural gas and oil from deep underground. While it has significantly boosted energy production, its proximity to residential areas raises several serious concerns. Here are the primary arguments against fracking near homes:

#### Health Risks:

Air Pollution: Fracking operations release various pollutants, including volatile organic compounds (VOCs) and hazardous air pollutants (HAPs), which can cause respiratory issues, cardiovascular problems, and other serious health conditions.

Water Contamination: Fracking involves injecting a mixture of water, sand, and chemicals into the ground. There is a risk that these chemicals can seep into groundwater supplies, contaminating drinking water sources with substances that can lead to health problems ranging from skin rashes to cancer.

Noise and Light Pollution: The constant noise from drilling and the bright lights used during night operations can disrupt sleep and have other negative effects on the mental and physical health of nearby residents.

### **Environmental Concerns:**

Water Usage: Fracking requires millions of gallons of water per well, putting a strain on local water supplies, especially in drought-prone areas.

Earthquakes: There is evidence linking fracking to increased seismic activity. The injection of wastewater back into the ground can induce earthquakes, potentially causing property damage and posing safety risks.

Landscape Degradation: Fracking operations can lead to significant changes in the landscape, including deforestation, habitat destruction, and soil erosion.

# **Economic Impacts:**

Property Values: Homes near fracking sites often see a decrease in property values due to the perceived and real risks associated with these operations. This can have a long-term negative impact on homeowners' investments.

Cost of Infrastructure Damage: Increased truck traffic and heavy machinery can damage local roads and infrastructure, leading to higher maintenance costs that are often borne by local governments and taxpayers.

Economic Uncertainty: While fracking can bring short-term economic benefits, such as job creation, these benefits are often temporary. Once the resources are depleted, the economic boom can turn into a bust, leaving communities worse off than before.

# Quality of Life:

Community Disruption: The influx of workers and increased industrial activity can disrupt the social fabric of communities, leading to issues such as increased crime rates and strained public services. Proximity to School: The proximity to Highlands Elementary School also puts that population of children at risk of the environmental concerns.

Loss of Recreational and Aesthetic Value: The presence of industrial sites can diminish the recreational and aesthetic value of nearby natural areas, impacting outdoor activities and tourism.

### Regulatory and Safety Concerns:

Inadequate Regulation: Regulatory frameworks often lag behind the rapid expansion of fracking, leading to insufficient oversight and enforcement of safety and environmental standards. Accidents and Spills: Fracking operations are susceptible to accidents, such as chemical spills and blowouts, which can have catastrophic consequences for nearby residents and the environment.

Overall, the proximity to the Erie Highlands community poses considerable risks and drawbacks. The health and safety of residents, environmental sustainability, and long-term economic stability are paramount concerns that warrant stringent regulations and thoughtful consideration of drilling being allowed in our neighborhood.

23 More fracking next door to where we raise our kids. Please don't.

07/17/2024

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	it will take too many water resources where we do not have enough water for the area. West Erie/Lafayette is more populated than ever. What about all the people who live in the area. The additional pollution from chemicals, noise, waste water does not make any sense.	07/17/2024
	The ECMC is getting a resounding "stop fracking near our homes" from all residents and physicians. Being so close to residents, has direct impact to reducing their health. I live within the Front Range and the CDPHE states to stay indoors on ozone action days. There have been 23 within the last 40 days and we only get the notification sporadically throughout the afternoon. Why is it we pay the consequences of having to be on house arrest because of over fracking? The EPA has told Colorado that you cannot take care of your own problems by enforcing reformulated gas. You know oil and gas operations are the number one contributor to ozone pollution within the Front Range. Tell the operators that you are doing your job to taking care of the health and safety of residents. Decline this application until operations are possible within federal health and safety standards. The oil isn't going anywhere, but we have been suffering the consequences of their greed when you approve every application without considering the cumulative impacts.	07/17/2024
	It is astounding to me that a project as consequential as Draco has not been properly made public in time for those who will be severely impacted for the rest of their lives to have input. I have only heard about this today, and public comment is about to closed in a matter of hours. How long will these oil and gas companies, especially Extraction, be allowed to leverage our quality of life and health for their profits? Our air quality has been beyond unacceptable, in large part due to existing Oil and Gas activities. We are already under water restrictions, and now this project will be gobbling up 500 million gallons of water? What about the danger and disruption of this project to residential neighborhoods? And what about the wells themselves and the dangerous paths they will take, and their ultimate maintenance? Do any of us really have any confidence that this will be handled responsibly? History tells us that it will not. Should we all just hope for the best here and lie down and let this project put the people of numerous communities at risk? There is a reason we don't allow industrial activities with risk of leaks, explosions, and contamination to be conducted in neighborhoods. WE LIVE HERE! I live just a few short miles away, and I can tell you that I will not be lying down for this kind of assault. This kind of impact laden proposal should be far more scrutinized by those who will actually suffer the effects before you even consider it, and this commission needs to do its job and DENY THIS PROPOSAL FOR THESE FRACKING WELLS. Fracking neighborhoods is unconscionable. That is precisely what this project will do.	07/17/2024
	I strongly oppose this project. The water usage is outrageous at any time but especially during a drought. We don't need the added noise and air pollution and the danger to residential areas - does Draco even know what they might hit along the way and how that could endanger the residents of the areas they want to drill under? I found out about this project on social media. Why wasn't there ANY notice?	07/17/2024
	My family chose to avoid living near fracking when deciding where to live, and we landed in Lafayette. It's a shame that this is being proposed, as it would now encroach on us! Please, for the sake of the health of everybody in these areas, do not allow this to happen.	07/17/2024
	We chose to live in Lafayette because there was NO fracking. This is way too close and might affect the values and stability of our communities and homes. Also against it due to the water "waste" the community cannot afford	07/17/2024
	This is way too large of a project, it is in an already volatile area with too many mines. It is a huge waste of water that can never be drank and is at high risk for contamination. This is very risky for our area. For once, the town and state should do what is in the best interest of those who live in the area. Not to mention the shear quantity of leaks and spills that have happened in the area increase the dangers with a project this large.	07/17/2024
	I STRONGLY object to this project. Please block it both for ourselves and our children. Even without this project, our ability to have water for our citizens is shrinking with every new house built and every day further into the climate crisis. This project can have disastrous effects on our entire community. And if you add in the potential lethal effects on the environment from the chemicals going into the ground and the incredibly polluting hydrocarbons coming out, I know that I can never vote for anyone that continues to support this! I humbly ask for your help.	07/17/2024
24	I am horrified to hear of this project so close to residential areas and homes in Lafayette and Erie. Our region lacks the water supply to sustain such a long-term project. Not to mention health risks and pollution.  And shame shame to those in charge of this project for such short notice to the community for	07/17/2024
	comment and input.  Since the passage of the transit oriented communities bill, areas close to the proposed fracking site	07/17/2024

	Erie side near the proposed site due to transit hub locations. To put that in perspective, Lafayette currently has only 12,718 units. We already have MASSIVE water issues in Lafayette with bills that have been increasing and will continue increasing by 5% every year! This proposal puts an additional massive strain on local resources that cannot cope with the current burden and is struggling to figure the new state mandated burden. To say nothing of the problems fracking wells have with containment and leakage in what has become an increasingly residential area. There was also not sufficient time or visible publication of the this proposal and notice of public comment periods for folks to be aware of and comment on this proposal adequately. I urge you to deny or at the very least, postpone a decision on this matter until you can provide adequate notice to those communities impacted by this proposal including those government agencies whose policies would be in conflict with this proposal.	
	Please say no to this fracking project, which will endanger the health and safety of Erie and Lafayette residence.	07/17/2024
24 4	I am amazed to only just now be learning of such an invasive new project being proposed that would negatively affect our established communities and only aggravate the existing problems with pollution and contaminants in the area. A proposal to drill new well bores under and around residential communities is not one that merits serious consideration. Please put our residents first and do not allow this project to happen.	07/17/2024
24 5	Please deny permits for this monstrous project. It will benefit no one but the O&G operator, use and ruin precious water resources, and create unnecessary danger to our community. It is unwanted & unneeded.	07/17/2024
	I work very close to this area and this would be a huge environmental disruption to the area. Fracking can sound safe and compelling on the tin, but in practice it is never this. There is a better way to meet our energy needs!	07/17/2024
	My family lives in Erie and are horrified by the proposed fracking area. There are too many issues surrounding fracking for us to feel safe in our own home if this continues.	07/17/2024
	I'm appalled and dispirited by the recent news of potential Draco Fracking to take place in Erie. I've been a resident here for almost 12 years now and have been very fond of my neighbors and the area. I love Colorado, including this region, for its open skies, usually clean air, wildlife, and open, natural spaces. I also appreciate the small town vibe, though this is rapidly diminishing.  I'm distressed to hear of a potential fracking plan that would negatively impact most of Erie. I'm most concerned by the proposed use of 541 million gallons of water. This water will not be reused or recycled, and wasting this precious resource on fracking is completely misguided and unconscionable.	07/17/2024
	Other environmental impacts, both real and potential, are deeply concerning. As someone with asthma and other respiratory issues, the concerns with air pollution and particulate exhaust are high, not only from the well but all the additional infrastructure associated with the operation, including increased big vehicle traffic. Further, fracking threatens the environment with potential spills, devastating fires, destablized geology in the area, and noise pollution. All of this will greatly diminish the quality of life that so many of us took into consideration when moving to Erie in the first place!  There are numerous uncertainties around the impact this will have on other wells, including those to be plugged and abandoned as well as those already abandoned between Erie and Lafayette. This	
	could have geohazardous consequences for those living near or on-top of abandoned mines.  Finally, indication that new, unprecedented and untested bores would be used in this project is incredibly insensitive to those who live here and a huge potential danger to our property and lives. Do not make us guinea pigs for this desperate and wrongheaded effort to extract resources for a dying industry.	
	Please, please, please be more creative and forward-looking when considering our energy needs. Respect the environment as well as your voting constituency here.	
	I cannot urge you strongly enough to decline any and all permissions whatsoever for this horrible fracking proposal!	
	Sincerely, -=Trace Reddell 1856 Hauck St. Erie, CO 80516	

Please do not allow this drilling to happen. The only beneficiary is the oil and gas company, and it is at the expense of the health and safety of my family, friends, and neighbors.	07/17/2024
The mission of the Town of Erie, Colorado is "enhancing quality of life by serving and building Erie with PRIDE". This is why so many of us want to move to Erie, invest all that we can do we can buy some land, to raise our future. This is a community that is full of life and families. We trust our town representatives to make decisions that will "enhance" our quality of life. This mission does NOT read "enhance our pocketbooks!" This project is a sell off at what costour future and our children. This is a great project idea but the wrong town and location and time. We all know better- we are a community of intelligence people who want better for our future. Find a new home for this projectpreferably that isn't already built on PRIDE. Maybe one that isn't built at all and see if people want to move there. The community of Erie Colorado doesn't want your project Sincerely, Erie's children and their future	07/17/2024
This makes no sense to have a fracking project like this in such a densely populated area. At the minimum, this project should be delayed to study the health and environmental consequences.  Please make a decision with the best interests in mind of the people who actually live here, not the best interests of the Oil and Gas Extraction company.	07/17/2024
Fracking is an immense waste of water and exposes our community to potential environmental hazards. The minor economic benefit is outweighed by the significant environmental and natural resource issues. Please deny the permits.	07/17/2024
Fracking is wasteful and destructive to our environment and our public health. It's a huge waste of water and the environmental and health hazards are detrimental to the well-being of our community. Fracking should never occur this close to a residential area. Please protect the health and future of our community and deny these permits!	07/17/2024
Fracking has a lot of negative environmental impacts such as climate change, water contamination, and air pollution. It does not belong where people live.	07/17/2024
No. We do not have the Water for this. This drilling benefits the oil and gas company, not our community.	07/17/2024
This is so unsafe and not for good for our community or children! No!	07/17/2024
The proposed fracking operation by Draco is filled with uncertainty. It is unclear whether this will imping on existing wells. It will use over 500,000,000 gallons of water, which cannot be reclaimed at a time when we are in the midst of drought. It will cover a large area of subsurface land, and the potential risks of such a drilling operation have not been spelled out for the community at all. This is something that must be delayed until it can be reviewed in depth by all local governments and receive public comments.	07/17/2024
PLEASE do not allow the proposed fracking. The richness of this area will be significantly negatively impacted by the health and environmental impacts of this activity. Keep Boulder County protected and safe from fracking. Just as we protect view corridors and buffers between communities, we must protect our community from the dangers of frackingthese are the things that makes our county unique and so highly sought after.	07/17/2024
Please consider the value of water and the impact of climate change. This short term profit is not worth the cost to our future generations.	07/17/2024
Subject: Major concerns with The Draco Oil and Gas Development proposal  I am sending this email to express my concern & strong disagreement with Weld County's DRACO plan which includes a fracking operation of 26 wellbores that will cover most of Erie to the southern border of the drilling spacing unit at Arapahoe Road.  Given the current on-going drought conditions along the Front Range, it is unacceptable that 541 million gallons of water will be used during this proposed fracking operation (as reported in Civitad's	07/17/2024
million gallons of water will be used during this proposed fracking operation (as reported in Civitad' records) - essential water that cannot be reused or recycled. This is reprehensible given that Weld and Boulder counties are presently under severe drought warnings  Second, I disagree with there being no transparent plan or timeline from Civitas for the plug-and-abandon operations of the 22 wells in the path of this project.  Third, because the 28 total wells within the planned drilling area are at risk of being 'hit' with the proposed 26 wellbores, this presents huge concern. Why? Because the practice of fracking so close to the 3 abandoned wells in the Lafayette Kneebone open space are risky and unknown.  Lastly, the proposed plan will subject communities nearby Erie and including Erie to hazardous air pollutants and the risk of spills, fires, increased extraction traffic, pollution, and noise.  In closing, it is imperative that citizen concerns be seriously considered by the Colorado state regulatory body and the Colorado Energy & Carbon Management Commission (ECMC).	

	At the very least, if it is not canceled, the Draco project should be delayed until these impacts are better understood and clearly articulated to the public. Thank you, Sheryl V. Taylor Resident & home owner in Erie, CO	
	Boulder county BVSD School District Email: srtaylorgoodall123@gmail.com	
	Sitayiorgoodaii 120 @ giriaii.com	
	I see that Colorado just made a top ten list of most dangerous states to live in. Please frame your decision in the best interest of the safety of the residents of Weld and Boulder County and deny this application. We don't need to play guess your best with this proposal.	07/17/2024
	I have been a resident of Erie for close to a decade and I vehemently oppose the allowance of more fracking, especially of this size in such close proximity to our homes and schools. The environmental and health impacts of fracking are detrimental to our community. For the greater good of Erie, please do not allow this to proceed.	07/17/2024
	I live in Lafayette, and as others have commented, chose it because it is a great community, and not near fracking. I oppose fracking for health reasons, esthetic reasons, and financial reasons (property values will drop-will my taxes?)	07/17/2024
	Fracking is waste of water and exposes our community to potential environmental hazards. The small economic benefit is outweighed by the environmental issues.	07/17/2024
	Subject: STOP FRACKING & Draco Oil and Gas Development proposal	07/17/2024
5	To whom it may concern:  I am in complete disagreement with Weld County's plan for this fracking operation of 26 wellbores which will cover most of Erie to the southern border of the drilling spacing unit at Arapahoe Road.	
	Given the current on-going drought conditions along the Front Range, it is unacceptable that 541 million gallons of water will be used during this proposed fracking operation (as reported in Civitad' records) - essential water that cannot be reused or recycled. This is reprehensible given that Weld and Boulder counties are presently under severe drought warnings	
	Second, I disagree with there being no transparent plan or timeline from Civitas for the plug-and-abandon operations of the 22 wells in the path of this project.	
	Third, because the 28 total wells within the planned drilling area are at risk of being 'hit' with the proposed 26 wellbores, this presents huge concern. Why? Because the practice of fracking so close to the 3 abandoned wells in the Lafayette Kneebone open space are risky and unknown.	
	Lastly, the proposed plan will subject communities nearby Erie and including Erie to hazardous air pollutants and the risk of spills, fires, increased extraction traffic, pollution, and noise.	
	In closing, it is imperative that citizen concerns be seriously considered by the Colorado state regulatory body and the Colorado Energy & Carbon Management Commission (ECMC).	
	At the very least, if it is not canceled, the Draco project should be delayed until these impacts are better understood and clearly articulated to the public. Signed, S. Richard Goodall	
	Erie, Colorado resident, home owner & tax payer Resident of Boulder County & BVSD parent	
	I've been hearing about this development for quite some time now, and the amount of skepticism reflected by neighbors is enough to raise concern about the future of this project. It would be a disservice to our community to enable this project to proceed amid the apparent loopholes that have been presented, like the lack of understanding of potential impacts on the operation via neighboring abandoned mines. I urge you to consider this further for the sake of our residents, especially considering the close proximity of Erie High School and neighborhoods like Colliers Hill.	07/17/2024
	I am not opposed to fracking. I actually think it is some thing that is needed. However, I am very concerned that so much this proposal goes underneath residential properties.	07/17/2024

Our pollution levels exceed federal standards for healthy air quality. Day after day we have Ozone action days. Boulder County information reports that oil and gas development is the most significant contributor to high ozone levels in the County. Why on earth would another fracking operation be approved to continue spewing harmful chemicals that cause health impacts including asthma, respiratory diseases, preterm births, cancer and increased risk of leukemia and lymphoma? Spills of highly toxic fracking fluids inevitably occur and pose a threat to our soil and water. Each well will use millions of gallons of scare water and cause possible contamination of groundwater. The health and safety of our communities should be the priority. Areas such as ours with severe air quality and water scarcity should be protected from any further oil and gas operations.

07/17/2024

The Town of Erie offers the following comments at this time but will provide additional comments prior to the hearing date via the eFiling Comment Portal to reflect continued progress through consultations on-going with Extraction/Civitas and ECMC staff.

07/17/2024

Transportation

The Town has expressed significant concerns during the WOGLA permitting process and in discussions with Extraction about impacts on traffic and transportation. The Town of Erie's referral for the WOGLA stated that the Town will require a Road Improvements Agreement ("RIA") with listed requirements since the haul route will be using roads managed by the Town. Extraction responded to this referral stating their acknowledgement of these requirements and agreement with the commitments.

To date, Extraction has committed to the following:

Conducting traffic impact studies both before construction and after pre-production operations, encompassing drilling, completions, and flowback. These studies will assess the potential impact of the proposed activities on CR 7 and Erie Parkway.

Providing financial assurance to the Town of Erie for any potential damage caused by the operations. Readily covering repair costs or reimburse the Town as necessary.

Discussing and executing a formal roadway maintenance agreement with the Town before construction commences. This agreement will clearly outline responsibilities for maintaining road integrity and addressing any potential impacts.

Implement established best management practices for minimizing traffic disruption, including:

- o Prohibiting staging of trucks or equipment on any Town of Erie right-of way.
- o Restricting the use of Class 7 vehicles or above on public roads during peak traffic hours (7:00-9:00 AM and 3:00-6:00 PM weekdays), except for essential operational and safety needs.

Extraction has been ordered through 1041WOGLA23-0062 to meet with the Town of Erie to discuss required access permits (if any), finalize haul routes, and road maintenance and road improvement requirements. Extraction has indicated in the OGDP application (240600157) that all traffic will be routed north on County Road 7, and east to I-25. Extraction has indicated to the Town that if a different route is to be used, a sundry notice would be provided to ECMC documenting this change. As a proximate local government, there is an inherent concern that the traffic impact studies, road improvements, and maintenance agreements that have been ordered by Weld County cannot be implemented on a last-minute basis. Given the proximity of the proposed location to the landfill located 1.36 miles to the southeast using the most efficient route, it would seem necessary to plan for using this route accordingly.

It is the opinion of the Town that the planned 4,033 round trips to dispose of solid waste utilize the most efficient and least impactful route. This route would necessarily utilize WCR 7 south to WCR 6 east to WCR 5 south to the Front Range Regional Landfill, operated by Waste Connections. The total distance of this route is 1.36 miles. Utilization of this route would reduce vehicle emissions (which contribute to ozone production within the NAAQS 8-Hour Ozone Severe Nonattainment Area), damage to roadways, and risk to the personal safety of Colorado drivers. Other landfills identified in the Waste Management Plan are up to 103 miles from the Draco Pad and none are within 35 miles of the planned operations.

Landscaping

Extraction has proposed building a berm along the northern edge and an 8-foot chain-link fence with privacy slats along the western edge of the pad; however, Erie believes that further consultation is necessary to ensure that any fencing solution aligns with the aesthetic and functional needs of the future neighborhood. Erie has proposed initiating discussions with Erie and the adjacent developer (Southern Land Company) to explore alternative fencing materials and designs that may better integrate with the surrounding environment while still providing the necessary screening and security. Pursuant to WOGLA Final Order Docket Number 1041WOGLA23-0062 (Draco Pad), Extraction shall meet with the Town of Erie and the Southern Land Company developer to discuss additional landscaping options to the west of the Location. To date, this meeting has not taken place. Schedule

Erie has requested a commitment to a single occupation of the site and a firm deadline of not less than 3 years to end preproduction activities. This will avoid potential timing conflicts with the Westerly

Residential Development to the west. The nearby developer will have a 2,000-foot setback requirement to follow for any oil and gas location in development but only a 500- foot setback for oil and gas locations in production. Depending on the timing of the development, additional BMPs may be necessary to protect public health, safety, welfare and the environment. Should drilling operations be delayed until the latter-end of the 36 month period allowed by the permit for the proposed location, there is a potential for additional RBUs to be located in proximity to the proposed location. Additional BMPs that Erie would request for consideration include but are not limited to: Monthly LDAR inspection for the life of the wells, or continuous centrally-located OGI monitoring Idling Equipment – While idling engine/equipment, maintain at the lowest frequency possible, as well as, in a position/location that will prevent sound from carrying to nearby residents. If Operator uses any pumps or engines that are not electrically operated. Operator shall use quiet design mufflers (also referred to as hospital grade or dual dissipative) or equivalent and shall use acoustically insulated housing or covers to enclose the engines or temporary source mitigation devices. Place temporary sound barriers around shale shakers to mitigate low frequency sound. Prior to commencing operations, at a minimum, the operator will provide an informational sheet to the owners/occupants of new RBUs that are nearby and adjacent to the well pad. The information sheet will include the operator's contact information and the nature, timing, and expected duration of the operations. Existing Plugged and Abandoned Wells within the Drilling and Spacing Unit The Town of Erie has identified 11 of the 49 P&A'd wells that present the greatest concern for the Town. These wells were identified based on the date of plugging, proximity to residential building units, and a review of the documents on file with ECMC. For these 11 wells, the Town has requested the following actions to ensure the health and safety of residents living near them is preserved and Obtain permission from each surface owner who has an abandoned well on the surface owner's property to access the property in order to assess the abandoned well. Assessment should include soil gas surveys from various depths and at various distances, adequate to ensure no leakage is occurring, or has occurred, of the abandoned well prior to hydraulic fracturing. Soil gas surveys of the abandoned well within one year and then at three years after production has commenced. If contamination is detected during any soils testing, no further operations or production may continue until the cause of the contamination is determined and resolved and the Town has given its approval for additional operations to continue. Civitas/Extraction has not yet responded to this request. Until a commitment to the safety of residents is provided by the operator, the Town requests that the above actions be added as a condition of approval. In the past 3 years, 5 previously plugged wells have required re-entry and re-plugging due to methane detected at the surface: State 3-16, API 05-123-29117, initially plugged 9/2017, re-plugged 3/2023 State 21-16, API 05-123-29113, initially plugged 9/2017, re-plugged 3/2023 State 6-16, API 05-123-29114, initially plugged 1/2018, re-plugged 9/2022 William H. Peltier #1, API 05-123-08131, initially plugged 9/1996, re-plugging on-going CPC 4-42-4, API 05-123-08861, initially plugged 6/1996, re-plugging being scheduled This demonstrates the potential for wells to communicate to the surface and require replugging, particularly when they are disturbed by horizontal completions near-by. Given the unprecedented lengths of the proposed horizontal laterals at Draco, the Town is adamant that this safeguard for the residents who live above the drilling and spacing unit is completed and the most at risk wells be tested to ensure no communication to the surface results from the proposed operations. Thank you for your consideration of these critical issues which are so impactful to the residents of the Town of Erie, Colorado. David R. Frank, Town of Erie LGD and Environmental Services Department Director 27 This project seems to be unnecessary, and considering the record lack of rain this year, irresponsibly 07/17/2024 0 wasteful of water. 27 The drilling and well head pose a hazard to the residents in the surrounding area and to the complex 07/17/2024 1 and important aguifers in region. Local residents with well water have aready seen serious contamination from oil and gas activity in the area. Methane gas emmisions are estimated to be from 28 to 36 times more potent than carbon dioxide as greenhouse gasses and are difficult to contain when drilling into the extreamly high pressure gas pockets in this region. The proximity of the BTEX burners to residents pose serious health hazards. The carcinogenic compounds from each well head are usually burned off at the site in BTEX burners. Benzene. toluene, ethylbenzene, and xylenes are commonly referred to as BTEX. They are volatile organic compounds that are found in petroleum and petroleum products. BTEX compounds are clear,

	colorless, highly flammable carcinogenic liquids at room temperature. It is a serious danger to health to have these carcinogens waste byproducts emitted and combusted at these well sites. Multiple hazardous waste BTEX burners can be seen at almost every well pad. Erie is already surrounded by alarming numbers of wellhead BTEX burners endangering citizen health.  There are concerns about how these wells will interact with other well bores and mine subsidence from historical activity in this area. Drilling through fractured and faulted rock in the Rocky Mountain region is not an exact science. There has been a gas explosion with multiple fatalities while drilling a well a few miles away at Highway 7.  The contamination and squestration of fracking water is a violation of Western water statutes.  The increase in industrial traffic is already a burden on area residents and would increse furnther with the development of this very large installation. It is also a potential hazard to surface waters including the very close proximity of the Community Ditch.  Please do not further endanger the the citizens of our community with this very large installation and dangerous heavy industrial activity.  Best regards,  James D. Briars  Erie, Colorado	
2	How many of these commenter's even live here? How many are paid to comment here? Is there anything in place to make sure that the people commenting live here or near here? The answer: no. I have live in Erie since 2008, and have family from Erie dating back to 1926 or earlier. These people commenting here are activists, many of them paid to come to these pages and spread misinformation and scare tactics. They all want us to drive electric cars and have all electric appliances but they don't think about how that electricity is made. They are worried about 541 million gallons of water when the gold course uses more, and the town as a whole uses upwards of 5 million gallons every day just in residential areas, let alone agriculture and commercial areas. They are making a mountain out of an ant hill.	07/17/2024
3	Many others have articulated their concerns far better than I can. The water issue is surprising - used once, then lost. That is not the natural way - water gets used, it gets recycled in various ways, or is returned as precipitation. The tremendous uncertainty of so much activity beneath both current & future residential areas has not been addressed (and it looks like my house is planned to be tunneled). Lastly, most of the residents have only found out about this situation through the diligent & tenacious efforts of our neighbors - not through what I would consider to be normal channels for something affecting my land.	07/17/2024
4	We have seen firsthand the risks associated with these oil & gas wells. We live in Canyon Creek backing to open space which was the location of a single well operated by Civitas. Despite expressing concerns regarding the poor condition of the well dating back to 2017 (I presented videos documenting the rust, overgrown vegetation surrounding the well, and loud noises the well would make at night), no action was taken to properly maintain the well with the exception infrequent checkins and a few emails from the operator assuring the well was safe and no danger to the local residents. Last year Civitas decided to finally cap the well (presumably to prepare for Draco) and, unsurprisingly, it was discovered that it had been leaking for years. Civitas public outreach failed to return our phone calls or even respond to emails with requests for more information. Clean up efforts have been half hazard. The only way more attention and communication has been done is a result of local residents pleading with the Town and HOA to help with putting more pressure on Civitas. There are still a lot of unanswered questions and residents feel like they have been left in the dark.  This is just an example of one instance of the danger a single well can result in. Over the past few years, I am aware of at least 6 other wells in Erie that they have discovered to have been leaking and posing health, safety and environmental risks. Some of these are located directly behind schools and homes.  I plead you to help put a stop to the massive Draco Pad. Just imagine the risks associated with such a large pad so close to neighborhoods could pose. The environment, public health, and public safety are at risk.  Additionally, the amount of water needed to frack this pad is insane especially for Colorado which is in the middle of a huge climate crisis and water is a precious commodity.	07/17/2024

As a resident of Country Meadows in Erie, I am asking the ECMC to please thoroughly review the environmental and potential health implications of this project before approving it. First, I believe that as we are feeling the extreme effects of climate change, we should not be continuing to support projects that expand oil and gas operations in Colorado. Instead, we should be looking at renewable infrastructure that has a lower carbon footprint. Secondly, it is concerning that Civitas will be using 541 million gallons of water that cannot be reused or recycled while both Boulder and Weld counties are experiencing severe drought conditions. We cannot afford to be allocating our water resources to projects that cannot use water in sustainably. Civitas needs to provide a transparent plan and timelin for this project and how it plans to plug and abandon the 22 wells in the path of this project. As a resident concerned about my health and that of my young children, I want to know that the potential impacts from drilling in a geohazard area before any approval is granted. At the very least, it is reasonable to delay this project until plan details are flushed out and all potential health and environmental impacts are well evaluated. Thank you for your time and consideration of your community's concerns.	
27 We cannot afford to use water on the front range for fracking. We are in a drought. There is also not 6 enough thought put into the long-term effect and remediation of this project.	07/17/2024
27 No on Draco Pad! For all the reasons already mentioned, the Draco Pad is a bad idea! Just because you can do something doesn't mean you should Please reject the Draco Pad! Have you been payin attention to the life of the planet? The Draco Pad just adds to its demise!	
As a concerned Erie resident, I strongly oppose the proposed fracking operations in our community. The potential risks to our health, environment, and quality of life far outweigh any perceived economi benefits. Fracking has been linked to groundwater contamination, air pollution, and increased seismic activity. Our town has already experienced extensive oil and gas operations, and adding more wells will only exacerbate these issues. The proposed Draco Pad with 26 new fracking wells and the Coyote Trails project with 7 additional wells are simply too close to our homes and schools. We've seen neighboring communities like Broomfield and Thornton fight back against the industry by implementing stricter regulations. It's time for Erie to follow suit and prioritize the well-being of its residents over fossil fuel interests. I urge our local officials to reject these proposals and instead focu on sustainable energy alternatives that won't compromise our health and safety.	
27 Dear Commissioners, 9 The Front Range is already in severe nonattainment for ozone air quality, and the #1 source of that ozone pollution is the oil and gas industry. Coloradans are also already suffering from the climate crisis, and the #1 source of climate pollution from Colorado is also the oil and gas industry - especiall when you consider that 40% of the oil and 75% of the gas is being exported out of state (where it is mostly burned, contributing heavily to the climate crisis).  Meanwhile, our communities are suffering health impacts from the benzene and other toxic emissions. Therefore, we urge you to oppose adding to the huge volume of pollution our communities are already experiencing by denying permits for this proposed project.  Thank you  Micah Parkin, on behalf of the Safe & Healthy Colorado Steering Committee	
28 Premature babies, increased respiratory dangers, sleep deprivation and stress from noise pollution.  O All of these are realized and proven dangers when CLEAN fracking sites operate in residential environments. Now multiply these dangers by immeasurable amounts when you add in spills and accidents that often occur. There is NO reward worth the risk of endangering the Erie Highlands community. This community has been a major tax contributor for Erie. Allowing residential fracking is a slap in the face of this young community and the contributions its members provide to the community.	07/17/2024
28 I urge you to vote no to the Draco Well Pad. We've already seen what drilling does to our town. How many more spills? These companies come in, wreak havoc in neighborhoods, and leave. Who's going to clean up when they leak? We still have no idea how much has leaked from other wells. Please, I urge you to vote no.	07/17/2024
We vote NO. I don't believe this project was disclosed to us in our purchase documents, and would not have purchased in this area if so. Now we are concerned about the stability of the ground beneat our home, Along with all other issues that may arise due to this project. Corporate owners/shareholders must live in this neighborhood or along boundaries of project, if voice of people is ignored. Shame to corporation and shareholders.	
Fracking generally is bad for the environment and human health and continues to damage the earth by extracting fossil fuels exacerbating climate change. Our community (Erie and the state) deserve better, and another large fracking project will only further contribute to Front Range air quality issues, whether that's from development of the wells, the inevitable methane leaks and hazardous chemical spills from the site, the fossil fuels and pollution from the trucks servicing the site, and the burning of fossil fuels produced by the wells.	07/17/2024

Please do not give approval to this request to frack within such a large population that will be negatively impacted. Our air & water is under threat and is already damaged by methane & oil & gas emissions. Water is already in high demand from the human population & for fracking use, is not sustainable. Please take the time to evaluate all the environmental impacts.	07/17/2024
This is dumb. At the very least, get off the sidewalk.	07/17/2024
There is no amount of monetary gain that can justify allowing a company to literally steal the land from beneath people's feet.	07/17/2024
<ol> <li>How are we going to make any progress on global warming if we just keep allowing more extraction of fossil fuels.</li> <li>Fracking is not as safe as many people think. If the wells are not built correctly, ground water can be contaminated, which will in turn contaminate streams etc.</li> <li>There are potential health risks of workers participating in fracking operations.</li> <li>The water usage during fracking is very high.</li> <li>These are just a few of the negative aspects of fracking. The only real benefit of this operation is to the companies doing the fracking.</li> </ol>	n 07/17/2024
We do not support this project in our community. The effects of fracking on our homes for decades to 8 come are too unknown. We do not want this in our neighborhood. Please vote no!!	07/17/2024
The 26 well pad is an abomination. It's unconscionable to even consider putting such a large mega pad in such close proximity to a residential development AND a future school site. Homes and explosive petrochemical operations aren't compatible. Period. This will also be the first pad of its kind where the horizontals will extend 5 miles out and under thousands upon thousands of homes. Over and over again we see these older wells not holding up to the pressure of the fracking of nearby megapads. We keep seeing P&A'd wells failing and leaking methane into the soil. It doesn't matter if they were P&A'd two years ago or 20 years ago. They can't withstand the pressure. There's no real regulatory body that oversees the O&G industry in Colorado. The industry gets to self report their owr spills, emissions, and inspections and the ECMC just takes their word for it. That's the epitome of the fox guarding the henhouse. There are multiple wells in Erie that haven't been cleaned up. Notifications for these spills were given 6 plus months ago and nothing has been done. Why would you approved more wells, when Civitas haven't even cleaned up the wells that spilled a long time ago? Please make the health and safety of the constituents living near this monstrosity your number one priority and DENY these permits. Thank you	a
We do not need this in our community! Many families with children live around the area and it is a huge safety concern. This goes against what the town of Erie stands for. It's not the greatest place to raise a family with fracking allowed so close to neighborhoods. This is just pure greed.	07/17/2024
29 We don't support this. We want to move toward renewable energy sources vs create more hazardous materials and unknown extraction risks under our neighborhoods! This does not benefit our community. It only benefits gas company. Who's paying for the externalities?! Please hear us. We as a community do not support this. Once approved we can't undo the damage.	
I would like to state my opposition to the Proposed Draco Pad because I do not think that there should be any oil drilling operations near a community. I hear how responsible oil and gas companies are, but then I continue to receive notifications about spills and leakages. Fracking scares me because of the high statistical correlation to earthquakes. When they did fracking near Trinidad Colorado about 12 years ago, there were some minor tremors that caused damage to the buildings in downtown Trinidad including Holy Trinity Catholic Church. The state of Oklahoma had a lot of earthquakes due to the fracking activity. A lot of polluting chemicals are used for fracking. I worked in the oil and gas industry from 1973 to 1994. The United States has now set a record for the amount of oil and gas production. I don't think that our economy or corporate profits should be at the expense of our health and clean air and water.	
<ul> <li>I am writing to express my deep concern and strong opposition to the proposed Draco oil and gas project in Weld County. The approval of this project would be an irresponsible decision with significant negative implications for our community, environment, and future generations.</li> <li>Our neighborhood (Compass) is directly in the path of the proposed drilling operations, which includes plans for horizontal drilling underneath our homes. This places our community at immediate risk of environmental hazards such as potential groundwater contamination, air pollution, and even seismic activity resulting from the fracking process. The unprecedented scope of this project, which includes drilling beneath residential areas, is alarming and unacceptable.</li> </ul>	
Living in an area where such invasive industrial activities are planned undermines the safety and stability we have worked hard to establish for our families. We chose this neighborhood to plant roots and create a safe, nurturing environment for our children. The approval of this project would force	

	many of us to consider relocating, which is the last thing we want to do. We are deeply invested in this community, and this project threatens to disrupt our lives and well-being significantly. The thought of having to uproot our family and leave the area we love and call home is incredibly difficult to bear.  Furthermore, it is unacceptable that we only became aware of this project through a social media post, raising serious concerns about the transparency and legality of the notification process.	
	Residents should be properly informed and given ample opportunity to voice their concerns before such significant decisions are made.	
	In conclusion, I urge the ECMC to consider the long-term health, safety, and well-being of our community. The Draco project is not in the best interest of the residents of Weld County. I strongly oppose its approval and request that the Commission prioritize public health and environmental protection over industrial development.	
29 4	no thanks, I am against this 100%	07/17/2024
	Please say no to this project and initiative. My family chose Erie, CO to live in because of its safe and responsible decisions for the people that live in this amazing town. Please let's put kids / families first and not corporate profits. Please do the right thing for Erie.	07/17/2024
	We recently moved to Lafayette because we believed it would be a safe place to raise our children. I am astounded that this project is even being considered given the unknowns involved with it and risk to human health. When will we start to prioritize human health over profits for large companies? Please, please reconsider moving forward with this project. Our family does not feel safe living so close to where this would be happening.	07/17/2024
29 7	Drilling outside of city limits just so you can drill horizontally for 5 miles underneath established neighborhoods directly through a veritable gauntlet of previously undermined coal areas seems almost comically evil. There's got to be a way for you to get your goods and make your profits without risking the integrity of so many families and homes in the future. There's already been issues with subsidence in some neighborhoods. Why add more risk. Close down some playgrounds for a few months and drill there. Replace it with a more awesome playground. That's at least in line with past practice.	07/17/2024
29 8	Your top priority is protecting the health of the people of Colorado. When you "permit" new oil and gas extraction, you are violating your oath. We already have enough oil and gas production in Colorado, we don't need any more of the toxic, deadly drilling and fracking, just to see the product and the profits flow out of state while the pollution stays here. Enough is enough, later is too late. Do your job now!	07/17/2024
29 9	This plan would be detrimental to the health and environmental well being of our community. Please, put the people first and deny this plan.	07/17/2024
	My family and I live in Erie and we are strongly opposed to the Draco Pad development. High-volume hydraulic fracturing techniques can contaminate drinking water, and can also impact local water sources. Let's protect our families and the Erie community by saying no to fracking.	07/17/2024
30 1	This is extremely harmful to our children, water of water, effects property value, air quality, risk to our children with the school near by.	07/17/2024
	There was a time when this area was pretty uninhabited, but as of late the growth has been rampant. I live in a neighborhood where there was a leaking abandoned well. What happens when this well is abandoned and leaking, putting all our health at risk. Please be smart and not pass this!	07/17/2024
	This would be an injustice to those that purchased homes near the site and could depreciate property values. Not safe for my kids either. Please do not do this.	07/17/2024

	Fracking poses significant risks to human health and the environment. One of the greatest risks is through water contamination from toxic chemicals, which can leave lasting impacts to the municipal drinking water supply. I'd like to provide my personal experience of spending my summers in White Earth, North Dakota. Located in the Bakken area, this region is notorious for fracking processes to extract oil. After nearly two decades of fracking in this region, local well water is no longer drinkable. Water is not only tainted red, but it also has an oil sheen and a foul taste. Our dogs refuse to drink it. Farmers on well water purchase bottled water for drinking and cooking because the tainted water is unsafe. Even showering in it is disgusting as it has a foul smell when warm. This is just one example of tainted water from fracking in the Bakken. Communities across North Dakota are relying on bottled water to survive due to oil and gas operations tainting local water supplies.  Don't let this happen to Erie. The proximity of any proposed fracking in this community, especially if	07/17/2024
	municipal water supply is polluted, will be disastrous to current and future generations.  This project is not appropriate for such a densely populated area. This must not be approved.	07/17/2024
	How can this be allowed/approved under such a high density area/community? It seems like the scale of this specific operation is unprecedented, correct? While I'd hope for the best, seems like a perfect set up for a potentially major disaster either short or long term. As great as Erie is, would rather not have a (tragic) documentary or movie made about this in this years to come.	07/17/2024
	Not a fan of having a drilling operation right underneath our homes. Too many unknown dangers here. Go do your fracking someplace far away from our neighborhoods.	07/17/2024
30	I would like to state my opposition to the Proposed Draco Pad. The air we breath everyday effects our health and we have to much pollution in the air already from the oil and gas industry in this area plus fracking causes unstable land in our communities. I do not think that there should be any oil drilling operations near a community. The risk of spills/leakage, pollution and unstable land isn't worth it. Fracking has a high statistical correlation to earthquakes. Also a lot of polluting chemicals are used for fracking. More corporate profits should not be at the expense of our health.	07/17/2024
	Sally Wolfe	
	Respectfully, Bob Romero Erie Colorado	
30 9	The Town of Erie is not the place for a significant drilling and fracking operation. While the drill site is on currently undeveloped property, the plans then have horizontal drilling for 5 miles under homes and schools, affecting a large portion of our community. It is a waste of water and exposes community residents to significant risks. Please deny all permits that would allow this operation to move forward.	07/17/2024
	Please do not allow this drilling to happen. The only beneficiary is the oil and gas company, and it is at the expense of the health and safety of my family, friends, and neighbors	07/17/2024
311	This is a tremendous waste of water resources and ignores the health and safety of the community.	07/17/2024
	This pad will impact a highly populated area. This should not be allowed to move forward without additional review by Boulder county based on the impact. We cannot expose families in this area to this without full review. Please do not approve.	07/17/2024
	Strongly oppose fracking at this location. There is a significant residential population here that continues to grow. Resources, natural and otherwise, should not be consumed by a fracking project. Also, the long term impacts on the land are not fully understood. This is not a good location for this industry.	07/17/2024
	Erie is a town of young families (median age is 37, and average household size is 3) and the town's top employer is St. Vrain Valley School District so I would hope "6 Locations w/in 2000' of School Property" (via Civitas) would be enough of a red flag to strike this proposal down. There's a Children's Hospital of Colorado just 2 miles southeast of the proposed site that will see a substantial influx of physical and mental health issues caused by the development of the Draco Pad. Please spare our town.	07/17/2024
	Please do not allow this project to proceed. The risks to our communities dramatically outweigh the benefits.	07/17/2024
	Please listen to the people in this area that would be affected by the fracking and cease and desist any proposal to do so. There are so many reasons that this would end up being terrible for the environment and all the people that would be negatively affected!	07/17/2024
31	Fracking is destroying the earth period. Waste of water, can poison our water, causes earthquakes.	07/17/2024
	<del></del>	

31 I'm strongly opposed to the approval of the Draco project. The uniseted nature of this project and leak 8 of consensus on the impact on underground mines and divisiting wells means that to trial this under thousands of homes is negligent. Further the residents of Erie have clearly expressed their opposition to Tracking at the hallot box and I'm appatied that Wield County disregarded those clearly expressed wishes, I ask the State to avoild doing the same. In addition, the planned waste of over 500m galions of water that cannot be cleaned or used again is a highly alterning waste of resources, particularly given the water shortages that are already unmanageable in the West. This wast of natural resources and the project as a whole can't reasonably considered in the community's best interests. Pleases reject this proposal.  31 Please DO NOT continue with the planned fracking project. This is going to cause direct and indirect 9 harm to our neighborhood. Not only will it cause potential structural and health hazards, but it is going to decrease home values. I do not understand how a private company can engage in activity for their sole financial benefit when it directly harms others. Please do not do this.  21 I'm deeply concerned a fracking project stating place is used a night populated area. There are 0 several PROVEN health and environmental consequences that are being ignored for financial gain. Please consider the actual people living here instead of lining the pockets of an Oil and Gas Extraction company.  22 Why would anyone want to frack after record heat waves and the Marshall Fire? We need to 1 acknowledge that climate change is real and recognize the consequences. Fossil fuels are wreaking have on our environment. The last thing we need is more fractive.  23 These are residential areas full of people who did not choose to have their homes and lives put 1 acknowledge that climate change is real and recognize the consequences. Fossil fuels are wreaking have the very many provided to the service of the		
9 harm to our neighborhood. Not only will it cause potential structural and health hazards, but it is going to decrease home values. I do not understand how a private company can engage in activity for their sole financial benefit when it directly harms others. Please do not do this.  2 I'm deeply concerned a fracking project is taking place in such a highly populated area. There are several PROVEN health and environmental consequences that are being ignored for financial gain. Please consider the actual people living here instead of lining the pockets of an Oil and Gas Extraction company.  32 Why would anyone want to frack after record heat waves and the Marshall Fire? We need to acknowledge that climate change is read and recognize the consequences. Fossil fuels are wreaking havoc on our environment. The last thing we need is more fracking.  32 These are residential areas full of people who did not choose to have their homes and lives put through such permanent uncertainty. This project should absolutely not be allowed to go through. That is without even mentioning the environmental consequences and additional affect on human and animal life to waste such an environmental consequences and additional affect on human and animal life to waste such an environmental consequences and additional affect on human and on our community! There are so many aspects that should raise red flags: health concerns, ecological impacts, increased traffic and congestion in a densiley populated area. The Draco pad plans should not move floward.  32 We moved to this neighborhood with the peace of mind that there was no current fracking as I want a safe clean place to raise my children. This is a place I love dearly and would hate to have to uproof my family if this project goes through. Please decline this project for the sake of all families that call this area home. I do not want fracking under my house, recreation center, children's school and fined shomes. This is disgraceful that this is even being considered I question the saf	8 of consensus on the impact on underground mines and existing wells means that to trial this under thousands of homes is negligent. Further the residents of Erie have clearly expressed their opposition to fracking at the ballot box and I'm appalled that Weld County disregarded those clearly expressed wishes, I ask the State to avoid doing the same. In addition, the planned waste of over 500m gallons of water that cannot be cleaned or used again is a highly alarming waste of resources, particularly given the water shortages that are already unmanageable in the West. This waste of natural resources and the project as a whole can't reasonably considered in the community's best interests.	07/17/2024
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	compounds into the air. The health of our children, families, and community should be our town's top priority.	
	In addition to long term health and safety, we would also be exposed to immediate noise pollution generated by heavy machinery and increased truck traffic, disrupting our daily lives and well-being. Moreover, fracking has been linked to increased seismic activity, raising the possibility of minor earthquakes that could damage our homes and infrastructure.	
	The impact on the town as a whole can also not be ignored. The strain on our local infrastructure from increased truck traffic and industrial activity will lead to more frequent repairs and higher maintenance costs, impacting our community's budget.  Furthermore, the fracking process requires substantial amounts of water, putting a strain on our local water resources and affecting supply for other essential uses. The presence of fracking operations can also lead to social tensions and divisions within our community, particularly between those who may benefit economically and those who suffer from the negative impacts.	
	Finally, property values in our neighborhood are likely to decrease due to the perceived and actual risks associated with fracking operations.	
	For these reasons, I strongly oppose the Draco Pad fracking operation and urge you to consider the well-being of our community over the potential economic benefits. It is crucial to prioritize our health, safety, and quality of life.	
33	So many great comments against fracking and in favor of keeping Erie a healthy town for all of us.	07/17/2024
U	Our household is 100% against the Draco Pad.	
33	We moved to this area for family, fresh air, high quality of life.  Erie's population is growing by leaps and boundsthe borders proposed are near a highly dense family area. The corns for spills and pollution are huge. The Denver metro area already has completed studies showing the Front Range having a depleted ozone and bending over to gas and oil only harms this area.  Water is very expensive in Erie and allowing our precious resources be used in such away without	07/17/2024
	any options for recycling are such a poor decision.  I encourage Erie to deny these permits and live out the values set forth by the toen.	
	My husband and I chose to move Erie with our 2 kids to be in a community who values the environment, raising our families, and education. We decided to purchase a home in the Boulder County part of Erie for this very reason - we don't want fracking in our neighborhood and especially under our brand new home. We have spent our savings to get into this home and school district. It's very distressing to think my home, my neighborhood, and my school could be affected by Weld County and ECMC allowing Extraction Oil and Gas Inc to circumvent Boulder County regulations yet still frack underneath Boulder County homes. The Coyote pad and other alternative sites have been denied due to local regulations and other concerns. What makes this new proposal different? This new location does not protect health and safety or minimize impacts on residents. This is a residential community that is growing and a huge contributor to the Erie community. I was not notified of this potential project nor was anyone in my neighborhood and it's distressing to think so many of us will be unaware of this going on underneath our homes without our voice being heard. We already have active and capped wells in our neighborhood that will likely be affected by the Draco pad fracking. What protections will be in place? I have not seen a plan that addresses this concern. Do not allow Extraction to slither around Boulder County regulations and do the very thing Boulder County residents have expressed they do not want. We do not want fracking here. We do not want fracking under our homes. I urge you all to deny this permit.	07/17/2024
	Erie Colorado has been my home for over 21 years. It is a family community with many children, and I'm concerned about the safety for our families with this additional gas well proposal. We are a growing community with homes getting closer to the many already present gas and oil wells. This proposed well also has the negative effect of using a large amount of precious water, which we know will not be good for the future of this area and Colorado. Please consider a denial or an alternative location for the proposed Draco Pad.	07/17/2024

4	There are so many reasons to say no (water usage, health of all of us in the area, the negative impact on the earth, the impact on the homes and home values in the area, just to name a few) to this proposal and one to say yes (profit for the oil and gas company). I can not believe that this is even being considered and I would ask in the strongest terms possible that this project not be allowed to move forward.	07/17/2024
5	As a 24 year Erie resident I am concerned about the impact on my family and other residents' health and safety.  The size of this project will impact several communities and seems we are not being informed properly.  Please stop this project	07/17/2024
6	I am strongly NOT in favor of this project so close to residential areas and homes in Lafayette and Erie. With fracking, there is a substantial liklyhood of contamination of the water supply with the additives and surfactants used in the process, not to mention the escape of methane which is a huge greenhouse gas. Let's REDUCE our dependance in fossil fuels, not increase it!	07/17/2024
7	Fracking poses real and serious risks for people who live and raise their families near these sites:  1. Chemical-contained fracking fluids are known to seep into groundwater supplies, contaminating drinking water—water that growing children will be drinking on a regular basis.  2. The release of VOCs during fracking degrades air quality, leading to acute and chronic health problems, including respiratory issues, headaches, and nausea.  3. Heavy truck traffic causes significant noise pollution, which Erie residents have already endured in the recent past. That same traffic and increase in industrial activity puts tremendous stress on local infrastructure, including roads and public services—funded by the same taxpayers (and children) being burdened with the negative effects of fracking.  4. The injection of fracking wastewater into deep wells has been linked to induced seismic activity, increasing the risk of earthquakes.  5. Proximity to fracking sites can decrease property values due to the associated risks and nuisances.  For all these reasons and more, please do not allow fracking in our neighborhoods.	07/17/2024
8	I am stunt again and again how fracking projects like this in the midst of (and right below!) residential areas keep being considered when it is so clearly impacting people's health and well-being negatively. We would do so much better with more solar and wind energy harvesting than wasting water on fracking, especially when water is quickly becoming the number one endangered resource around here. How can this even be considered? It makes no common sense other than for a few people to make money at the expense of a lot of people suffering long term. This has to STOP NOW!!!	07/17/2024
33 9	The Draco project should be delayed until these impacts are better understood:  1. water use- especially water that cannot be reused or recycled  2. plan or timeline from Civitas for the plug-and-abandon operations of the 22 wells in the path of this project  3. Careful assessment of the risks of proposed wellbores so close to orphaned and abandoned wells in the Lafayette Kneebone open space  I am further concerned and therefor opposed to the risks posed by hazardous air pollutants and particulate matter and the risk of spills, fires, increased extraction traffic, pollution, and noise in this heavily populated area  Thank you	07/17/2024
0	I am opposed to approval of the Draco project. The proposed 5 mile drilling has never been done before and Erie residents should not be subject to an experimental design that could endanger lives and certainly will impact our quality of life during both the capping and drilling processes. Please listen to the people, not the corporations!	07/17/2024
1	I am absolutely opposed to any and all fracking activities near my home or any people for that matter. Countless studies have shown that fracking leads to poisoned groundwater and localized earthquakes.	07/17/2024

Stop! Look! & Listenwe don't want this project here in our town. What are you doing and why? Why are you thinking the town would accept such a project. We are done with fracking in such a populated area. Rethink this for the good of our town and its residents.	07/18/2024
Total: 342 comment(s)	