



Planning & Development
Planning

November 10, 2017

Colorado Oil & Gas Conservation Commission
ATTN: Matt Lepore, Director
1120 Lincoln Street, Suite 801
Denver, CO 80203

Matt.lepore@state.co.us
VIA EMAIL ONLY

RE: Crestone Peak Resources, LLC ("Crestone")– Colorado Oil & Gas Conservation Commission ("COGCC") Rule 216 Comprehensive Drilling Plan for Sections 1, 2, 3, 10, 11 and 12, Township 1 North, Range 69 West, 6TH P.M. and Sections 25, 26, 27, 34, 35 and 36, Township 2 North, Range 69 West, 6TH P.M. ("CDP").

Dear Director Lepore:

Thank you for providing the Town of Erie the opportunity to provide comments on the Crestone CDP. The Town of Erie provides the following comments:

- 1) **Section 11 Well Pad.** Relocate the proposed Section 11 Well Pad to the State Highway 52 corridor.
- 2) **Pipelines.**
 - a. In an effort to reduce any impacts to existing Town of Erie residential neighborhoods, the proposed pipelines through the Kenosha Farm and Erie Village subdivisions should be relocated to the North 119th Street and Kenosha Road right-of-ways.
 - b. Crestone shall provide all pipeline/flowline mapping data to the Town of Erie for all well pads within the CDP in accordance with Title 10 of the Town of Erie Municipal Code.
- 3) **Noise mitigation.** Crestone shall comply with the following noise mitigation requirements on all well pads within the CDP located south of State Highway 52:
 - a. For db(A) scale noise, Crestone shall insure that the noise levels from operations (including the use of a drilling rig, completion rig, and/or stimulation) under COGCC Regulations 802.b and 604.c.(2)(A) are reduced at least ten (10) db(A) below the maximum level permitted by those Regulations.

- b. For this purpose, the noise level shall be measured as set forth in COGCC Regulations 802.b & c, except no measurements shall be taken when traffic is passing the sound level meter, Crestone shall be present during all measurements. As set forth in COGCC Regulation 802.b, the noise levels shall be subject to increase for a period not to exceed fifteen (15) minutes in any one (1) hour period and reduction for periodic, impulsive or shrill noises.
 - c. For db(C) scale noise, Crestone shall comply with the requirements of COGCC Regulation 802, as such requirements may be amended.
- 4) **Well leak detection and repair.**
 - a. Crestone shall perform audio, visual and olfactory inspections on a monthly basis at all of the well pads within the CDP. Crestone shall also inspect all well pads within the CDP with an infra-red camera on a semi-annual basis. If Crestone determines that any repairs are required based on these inspections, Crestone shall promptly initiate these repairs.
 - b. Crestone shall report to the Town of Erie and Boulder County the inspection results on an annual basis in the same format that Crestone uses for reporting to the Air Pollution Control Division under Regulation 7.
- 5) **Drilling and Hydraulic Fracturing Fluids.** Crestone shall not utilize any product containing diesel, 2-Butoxyethanol (2-BE) or benzene in drilling or hydraulic fracturing operations on any of the well pads within the CDP.
- 6) **Water Supply.** In an effort to reduce truck traffic, the Town of Erie encourages the use of nearby water resources for the drilling and hydraulic fracturing of the wells at all of the well pads within the CDP.
- 7) **Access/Traffic.**
 - a. Haul Routes. The Town requests Crestone provide the proposed haul routes to all of the proposed well pads within the CDP.
 - b. All existing or proposed access roads into the well pads directly accessing Town of Erie roads, shall be improved a minimum distance of two hundred (200) feet on the access road in accordance with Title 10 of the Town of Erie Municipal Code.
 - c. To further reduce truck traffic, the Town of Erie encourages Crestone to explore alternative methods of delivering materials/supplies to the well pads.
- 8) **Road repairs.** Crestone recognizes that truck traffic accessing the well pads may cause damage to Town of Erie roads and that road repairs may be needed to mitigate such damage. To this end, Crestone shall arrange for a qualified outside consultant to perform a road impact study, including pavement analysis, for all Town of Erie roads that are used to access any of the well pads within the CDP. The consultant shall conduct the first part of the study prior to Crestone commencing operations at any well pad within the CDP and the second part

of the study after Crestone completes all drilling and hydraulic fracturing at any well pad within the CDP. Crestone and the Town of Erie shall use these studies to determine the extent of any damage accruing to the road during the study period. Crestone shall promptly pay the Town of Erie to repair such damage or else arrange and pay the cost of such repairs itself whichever Crestone prefers.

- 9) **Revised CDP Submissions.** The Town of Erie reserves the right to modify and/or provide additional comments based on revisions to the CDP.

We appreciate the opportunity to coordinate with you on issues of mutual interest. Please feel free to contact me at 303-926-2771 with any questions or clarification of our comments.

Regards,



R. Martin Ostholthoff,
Assistant to the Town Administrator Development Services
Local Government Designee

cc: John Noto, COGCC
Jason Oates, Crestone Peak Resources, LLC
A.J. Krieger, Town Administrator
Chad Taylor, Environmental Planner