

3414 Lakeview Circle
Longmont CO
September 7, 2012

Colorado Oil & Gas Conservation Commission
Thom Kerr
1120 Lincoln Street
Suite 801
Denver, CO 80203

Dear Mr. Kerr

Thank you for the opportunity to provide my perspective on the existing COGCC setback rules.

When the stakeholder process commenced, the oil and gas industry spokespeople were adamant that there would be no change to the current setbacks unless there is scientific evidence for such a change. What was discovered during the subsequent weeks of discussion is that the current setback distances are not based on any measure of health science.

The current setbacks are based solely on operational risks from fire, collapse, and explosion, and requirements for emergency response. Surprisingly, we were not allowed to review the details of these requirements. Allegedly, at some time in the past, such information (from Alberta?) did exist, but its lack of inclusion in the stakeholders process makes it impossible to determine if the Alberta study is still relevant. Modern wells bores are exceptionally long, off-vertical, and co-existent at a single location.

The Real Estate and Agricultural communities aligned with the oil and gas industry to endorse the current setbacks. But in the end, these industries rely on anecdotes and precedent rather than on science to substantiate the current regulations.

As a result of the discussions during the stakeholder's process, it is obvious that the current setbacks have been formulated without any regard for the health and welfare of the people who live, work, play and study within the vicinity of oil and gas well drilling and operations. Yet, most every participant recognized that modern oil and gas well drilling and operations are a heavily industrialized, ongoing, risky activity, and that larger separation between this industrial process and daily personal activities is beneficial. Without exception, everyone agreed that modern

consolidated drilling pads cause a more significant impact than do single wells. This means that a few members of our citizenry are currently being sacrificed as collateral damage because setback requirements have not been increased to offset the impact of modern concentrated technologies.

This same modern technology of horizontal/directional drilling and consolidated wells provides the technology that would allow oil and gas operation to be consolidated into appropriate isolated industrial locations. Perhaps setback distances should be proportional to the number of well heads or to the total lineal feet of bores that are allowed to emanate from a single location. The "*Well to Building Setback*" spreadsheet shows us that it is generally not necessary for wells to be located within 1000 feet of our homes and buildings.

I request that the Stakeholders Process should conclude with a request to the COGCC commissioners:

Please proceed with rulemaking to review and update the current minimum setback requirements between oil/gas well locations and occupied buildings. The current setbacks requirements are outdated. Modern practices of consolidation of wells at industrialized locations and modern methods of hydraulic fracturing and directional drilling require a modern perspective. Although more information needs to be pro-actively acquired by the State and COGCC, there is considerable preliminary data that indicates that dangers from oil/gas well drilling and operation is harmful. Until the ideal setback that prevents people from being injured is conclusively determined, it is best to be conservative. COGCC Setback distances should be used to decisively protect the public.

Sincerely,

Joe Bassman