



Great Western Operating  
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September 1, 2017

***VIA CERTIFIED MAIL WITH RETURN RECEIPT***

Ms. Kim Sanchez  
Chief Planner  
Boulder County Land Use Department  
2045 13th Street  
Boulder, CO 80302

**RE: Great Western Operating Company, LLC Request for Boulder County to Provide  
Notice and Be Accompanied During Inspections of Oil and Gas Operations**

Dear Ms. Sanchez:

Great Western Operating Company, LLC ("Great Western") is an oil and gas operator registered with the Colorado Oil and Gas Conservation Commission ("COGCC"), Operator No. 10110. Great Western operates oil and gas wells in Boulder County. It is important that Great Western maintains the security and safety of its oil and gas wells and facilities.

As a part of this effort, Great Western has posted signs at its oil and gas locations advising that "Authorized Personnel Only" may access these sites. If the County wishes for its inspectors or other personnel to enter a Great Western oil and gas operations area, Great Western asks that the county first seek permission by submitting a written request to Great Western's Vice President of Government Affairs/EHS. Great Western will then schedule a mutually agreeable time for the inspection and assign a representative to accompany county personnel.

As you may be aware, recent court decisions, including a decision by Boulder County District Court Judge Norma Sierra on April 26, 2017, have reconfirmed that the General Assembly has assigned the primary responsibility for regulating and inspecting the technical aspects of oil and gas operations to the COGCC. State inspectors receive specialized training unavailable to others and are fully qualified to safely enter and inspect oil and gas facilities. For all others wishing to enter and inspect its facilities, Great Western asks that they comply with the notice provisions set forth above so that Great Western may better monitor those who access its oil and gas wells and facilities.

Ms. Kim Sanchez  
Boulder County  
September 1, 2017

Should the county wish to take a more direct role in inspecting oil and gas wells and facilities, it has the option of entering into an Intergovernmental Agreement ("IGA") with the COGCC pursuant to C.R.S. § 34-60-106(15). This statute provides that the COGCC may "assign its inspection and monitoring function, but not its enforcement authority, through intergovernmental agreement..." Other counties have exercised this option and the COGCC has helped train their inspectors.

We appreciate your attention to this matter. If you have any questions, please do not hesitate to contact me.

Sincerely,  
**Great Western Operating Company**



Scot Donato  
Vice President of Government Affairs/EHS