



Office of the County Attorney

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October 10, 2017

Director Matt Lepore
Colorado Oil and Gas Conservation Commission
1120 Lincoln Street, Suite 801
Denver, CO 80203
Matt.lepore@state.co.us

VIA EMAIL ONLY

Re: Crestone CDP Public Meetings

Dear Director Lepore:

On October 9, 2017, Crestone Peak Resources LLC sent an email to selected landowners in the area covered by its Comprehensive Drilling Plan application. The email, a copy of which is enclosed, notified recipients that their property boundaries were within ½ a mile of a “proposed oil and gas location” in the CDP and announced a public meeting on October 18 and a public telephone town hall on October 19. We presume these meetings are meant to satisfy the COGCC requirement for two public meetings in the CDP area during the October 16-November 3 public engagement period specified in the COGCC Pre-Hearing Application Process and Timeline. We strongly object to Crestone’s communication and proposal as it fails to meet both the letter and spirit of the COGCC public meeting requirement.

First, Crestone clearly indicates with this email and the printed tickets for landowners within a ½ mile radius from “proposed oil and gas locations” that it has pre-selected its CDP oil and gas locations, despite the lengthy process of stakeholder and agency engagement designed by the COGCC to develop the specifics of the plan. In fact, those sites have apparently been selected prior even to the publication of Crestone’s first CDP submittal due October 13, so no one in Boulder County has seen the proposed locations, yet they are already being used to define who stakeholders are. This suggests that Crestone has no real intention of engaging in on-going consultation and receipt of public input in developing its plan, which should not be allowed to stand at this early stage.

Second, the timing of the meetings is inadequate to provide true public engagement. The first meeting is proposed within five days after publication of Crestone’s first submittal, giving stakeholders very little time to review the proposals and seek any professional advice necessary to understand them. This severely reduces the effectiveness of the meetings. Moreover, holding two meetings on consecutive days, when it is very foreseeable that people may not be able to make either one, does not meet COGCC’s requirement for two different, accessible public meetings during the three-week public engagement timeframe.

Third, the large multi-well pads proposed as part of the CDP application will have impacts on all residents of the CDP and beyond, particularly in terms of traffic and pipeline construction. Two of the possible county-owned sites Crestone has expressed interest in are on the extreme edges of the CDP area, indicating further that impacts will stretch beyond its borders. The

opportunity to review the proposed CDP materials and provide written comment are not and should not be limited to landowners in particular places and nor should the public meetings be. Those meetings should be open to all landowners within the CDP and within at least a mile outside all three of its Boulder County borders.

Fourth, Boulder County in its capacity as a landowner did not receive an invitation to the meetings. Crestone has indicated interest in using four county-owned parcels as oil and gas locations, so the county as a landowner is clearly entitled to participate.

For these reasons, the COGCC should immediately require that Crestone modify its public meeting approach or hold additional meetings that are open to all affected landowners within and immediately outside the CDP area.

Sincerely,



Kate A. Burke
Assistant County Attorney

cc: Kim Sanchez
Jamie Jost

From: CDPBoulder
To: [Kendra Carberry](#)
Subject: Invitation to Stakeholder Meetings for Crestone Peak Resources' COGCC Rule 216 Comprehensive Drilling Plan – Conceptual and Preliminary Elements
Date: Monday, October 09, 2017 12:15:32 PM
Attachments: [Carberry, Kendra; Davidson, Chris.pdf](#)

TO: CDP Parcel Owners within 0.5 miles of Crestone's Boulder County proposed oil and gas locations

FROM: Crestone Peak Resources Boulder County CDP Team

RE: Invitation to Stakeholder Meetings for Crestone Peak Resources' COGCC Rule 216 Comprehensive Drilling Plan – Conceptual and Preliminary Elements

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Crestone Peak Resources would like to invite you to attend an upcoming stakeholder meeting on October 18 or October 19. Your parcel boundary is within 0.5 miles of a proposed oil and gas location within Crestone's proposed Comprehensive Drilling Plan (CDP) area. At these meetings, we will share preliminary aspects of our draft plan, including potential surface locations and a timeline of the proceedings related to the CDP. Most importantly, we want to give you an opportunity to share feedback with the Crestone team and ask questions in a safe, open and respectful venue. Please note that additional meetings will be held at later stages in the permitting process to address specific operational aspects (equipment, mitigation measures, etc.) of oil and gas development.

The details for the two stakeholder meetings are below. We hope that you will consider attending at least one of them, though the same information will be shared at each meeting.

In-Person Stakeholder Meeting: Wednesday, October 18, 2017 At Vinelife Church 6:00 p.m. to 7:30 p.m.	Telephone Town Hall Stakeholder Meeting: Thursday, October 19, 2017 Meeting participation by phone only 5:30 p.m. to 6:30 p.m.
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7845 Lookout Rd., Longmont, CO
80503

Please bring the enclosed ticket, your ID and/or proof of name and address that matches Boulder County's parcel records. If you would like to request an additional ticket for another adult member of the household, please email cdpboulder@crestonepr.com with their name and one will be held at the registration table.

You are not required to attend the in-person meeting. To make attending the meeting easier, every parcel owner was provided a pre-printed ticket(s).

Security will be in place at this meeting to ensure everyone's safety.

We will also host a telephone town hall meeting for those interested in joining the discussion by phone. You will be able to share your feedback and ask your questions live during this meeting as well.

Registration is required for this meeting. *Please RSVP by emailing us at cdpboulder@crestonepr.com and providing the phone number that you would like to be called at for the meeting – our meeting provider will reverse dial meeting participants shortly before the meeting.*

Please RSVP for the telephone town hall by noon on October 19.

If you have not already done so, please visit our website – www.crestonepeakresources.com and click on the 'Boulder County CDP' tab – to provide additional contact information and select preferences for how you would like to hear from us. If you have already filled out the contact preference form and mailed or emailed it back to us, you do not need to do anything more.

Crestone is committed to operating safely, responsibly and with minimal impacts on the communities where we work. We believe collaboration with our neighbors is an important piece of this, and that's why we have elected to proceed with a COGCC Rule 216 CDP specific to our potential development in Boulder County. We hope that you will consider attending one of the upcoming stakeholder meetings to share your feedback and learn more about our potential development. You can also visit the COGCC home page at <http://cogcc.state.co.us> for additional information related to the CDP. The draft plan will be available on the COGCC's website on October 13, if you would like to review it prior to the stakeholder meetings.

As always, please feel free to email us at cdpboulder@crestonepr.com with questions

or for more information about the meetings. We look forward to meeting you, either in person or by phone.