

Comments before the COGCC on 8 North's Drilling & Spacing Unit – July 31, 2018

- My name is Elise Jones and I am proud to be a Boulder County Commissioner. Thank you for the opportunity to testify today.
- Boulder County owns significant surface and mineral interests within 8 North's proposed drilling and spacing unit. Moreover, thousands of county residents live in and near those areas.
- We understand that 8 North proposes to locate its wells in Weld County and within the Town of Erie; however, we have plenty of evidence from area residents in Boulder County that the impacts of large-scale drilling are not confined to the well pad locations. Noise, odor, pollution, and light do not respect approved sites or jurisdictional boundaries.
- Our voluntary inspection program has revealed that oil & gas facilities leak, despite best efforts. As you may recall, and will hear more about later today, our inspector found gas leaks at 65% of inspected sites in Boulder County.
- Methane and other VOCs from oil & gas development are major ozone precursors. Our region hasn't been able to achieve the 2008 national ozone standard yet and will find it even harder to comply with the new, more stringent 2015 standard. As a member of the Regional Air Quality Council for nearly a decade, I can tell you that we won't be able to meet the new standard without curbing growth in oil & gas emissions.
- Methane is also a potent contributor to climate change. We are in the middle of a global heat wave: 17 of the hottest years on record have occurred in the last 18 years (and there are rampant wildfires raging across the country this summer -- 13 in CO, 98 nationally -- so I would hope that we no longer need to debate the existence and urgency of climate change).
- Our air quality monitoring partnerships with the University of Colorado and other institutions demonstrate that VOCs from oil & gas travel with prevailing winds, meaning that VOC leaks, including BTEX and methane, in Weld County affect the air quality in Boulder County.

- For all of these reasons, Boulder County is an intervener in the 8 North applications and asks the Commission to carefully consider the evidence and legal arguments we will present today.
- One issue I want to call your attention to is the evidence you accept from 8 North to support its right to do the development it proposes. When a landowner comes to the County with a proposal to develop property, we require the applicant to provide competent evidence of foundational questions like the applicant's property ownership and proof of access to the property. The units 8 North seeks to establish carry heavy consequences for the affected landowners, neighbors and the environment, yet I understand that it's longstanding practice for the Commission to just take the operator's word that the operator owns the requisite mineral interests. I'm not an attorney, but that doesn't sound right to me. It seems that a company seeking to profit off of minerals under other people's land should be required to make a good showing of its basic right to do that. I hope you take our attorneys' arguments on this issue very seriously.
- You've heard from me before and you will hear from me again. The status quo of oil & gas development on the Front Range, and the trend toward larger and larger facilities coming closer and closer to populous areas is not working. Boulder County, along with its sister governments, will persist in pressing for better protections for our constituents, in this proceeding and any to come.