Broomfield City Council and Staff City and County of Broomfield One Descombes Drive Broomfield, CO 80023

August 2, 2018

Dear Broomfield City Council and Staff,

Broomfield residents overwhelmingly passed Ballot Measure 301 to ensure that no permits would be issued for oil and gas development, unless the conditions of ensuring protection of public health, safety, and welfare were met. The 301 Broomfield Health and Safety First committee, in conjunction with several local citizen groups, have presented numerous reasons for the City to not approve the CDP in its current state, yet the City states they plan to approve the CDP despite these issues. This is a direct violation of the law.

Here are just a few highlights of the remaining issues with this document:

- The Risk Management (RM) chapter from Extraction is not written in engineering nor scientific language. It is a self-aggrandizing, pompous statement of assertions with no references, footnotes, supporting data, nor peer-reviewed studies. Furthermore, Extraction has not yet provided a risk analysis as they have agreed in writing to perform.
- This version is worse than any previous version with no attempt at quantification, reporting versus impact is missing, and there is no matrix.
- There is no mention of, or attempt to invalidate health risks, which are validated by hundreds of peer reviewed studies.
- No "welfare" related risks were addressed which would include, for example, property values and loss of tax base.
- The requirements for monitoring and reporting as a function of impact have been removed from the previous version.
- The BMPs have total reliance on sub-contractors and there is no mention of how often verification of compliance will be audited.
- In the wetlands section, the biologist review is lacking critical information and neglects to address that a protected species, burrowing owls, are nesting in, or near, well sites associated with this project.

We ask that until the conditions put forth by the City Charter are met, that the CDP not be approved. We also believe based on the above shortfalls, that the CDP remains in breach of contract and the City should escalate this breach and move forward in a way that is protective of public health, safety, and welfare, and the environment.

Respectfully,

Concerned Residents of Broomfield



















