

# **BATTLEMENT CONCERNED CITIZENS**

Battlement Mesa, Colorado

November 6, 2009

Garfield County Dept. of Public Health  
195 W. 14<sup>th</sup> Street  
Rifle, CO 81650

Dear Ms. Meisner and Mr. Rada:

On behalf of the Battlement Concerned Citizens (BCC), a committee of the Grand Valley Citizens Alliance, we thank you for the opportunity to discuss the special public health concerns associated with natural gas development within the Battlement Mesa Planned Unit Development (PUD). We appreciate talking to public health officials who understand and appreciate the potentially serious health hazards from the drilling industry.

To be sure, drilling up to 200 wells, with some rigs planned within 400 feet of homes, has raised considerable health concerns within the community. Within two weeks in September, BCC members garnered over 400 signatures from Battlement Mesa residents on a petition to the Board of County Commission (BOCC), the Colorado Oil and Gas Conservation Commission (COGCC), and the Colorado Department of Public Health and Environment (CDPHE). That petition asked that these agencies defer any permitting decision until a thorough study of the public health, safety and welfare concerns has been completed.

In our discussion with you, BCC members stressed that Battlement Mesa is a unique community and therefore, a special health baseline study is warranted before drilling within the PUD continues from the Williams Production well pad or is expanded with Antero's Comprehensive Drilling Plan (CDP).

As noted in our discussion last week:

- Battlement Mesa has approximately 5000 residents, many of whom are seniors with existing health problems and compromised immune systems. Also included are three schools with about 600 students and Mesa Vista Assisted Living facility with 35 to 45 elderly citizens with 6 of them currently on oxygen.
- Because of the unknown chemical compositions used in drilling practices, oil-and-gas exploration operations within Battlement Mesa could expose a large number of vulnerable people to potentially long-term adverse health and environmental impacts -- making sick people sicker

- There are currently no effective means of monitoring drilling chemical use and its impacts on air and water quality within the Battlement community
- Data from the air quality study that was completed in 2008 was used by Dr. Russ Walker to show there are real hazards from drilling operations in close proximity to humans. Drs. Walker and Teresa Coons also went on to make a series of recommendations to protect public health based on the study data.

On behalf of Battlement Mesa citizens, BCC members have requested the county and state to conduct a "Health Impact Assessment" (HIA) before a Special Use Permit (SUP) is approved to any company drilling within the Battlement Mesa PUD.

We feel these subjects should be addressed in a Battlement HIA:

- The baseline health study should be specific to Battlement Mesa and its population
- Conduct baseline monitoring of air and water quality within the Battlement PUD before any drilling operations continue
- Conduct a comprehensive and continuous air, water, and soil quality monitoring system at all well sites during all phases of operation
- Establish a medical monitoring system to identify any changes in baseline data or trends and/or anomalies in medical practices
- Require full disclosure of materials used in drilling and fracturing processes to health officials and scientists conducting these studies
- Test whether a buffer zone of not less than one thousand feet between any well operation and any residence, business, or public building will protect health standards

Recent COGCC Rule Amendments encourage responsible energy development and inter-agency collaboration. The CDPHE has the authority to participate in the permit review process and recommend additional measures to protect public health. In short, Garfield County has an opportunity to communicate with both state agencies to request additional public or environmental protections. Certainly, Battlement Mesa's unique situation requires additional oversight and analysis – and provides an opportunity for agencies to collaborate on a detailed HIA -- possibly the first such study conducted in the state in regards to energy development in an established residential area of people with compromised health issues.

Funding sources are many. For instance, the Robert Wood Johnson Foundation and the Pew Charitable Trusts are currently welcoming HIA proposals from local and state agencies, non-profit organizations, and business interests. We also feel that other sources of funding should be pursued. Recently Garfield County received an additional approximately \$8 million in severance tax revenue from the state. Some of those funds, as well as monies from the Energy Mitigation Fund could be utilized. Also, if any funds are generated from fines to energy operators for violations of county regulations, those monies should also be considered. It may also be appropriate to require any organization seeking county approval for gas drilling or exploration operations in the PUD to

participate in the cost of an HIA as a condition of the application process. The CDPHE might also participate in such a project – either financially or otherwise.

Natural gas is an important domestic energy that merits responsible development. However, some of its development practices remain unsafe and there are particular areas where drilling proposals deserve additional scrutiny and oversight. Since our community will need additional levels of protection when so many wells are to be developed, we believe the people of Battlement Mesa deserve a public health risk and baseline environmental study to ensure public health protection during all stages of energy development.

We appreciate that you will take our concerns to the appropriate members of the BOCC, COGCC, and CDPHE and we look forward to further discussion with you regarding the HIA process.

Thank you for your consideration.

Battlement Concerned Citizens

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