

	Comment	Staff Notes
1	Seem on the low side.	Fees designed to cover program costs and we will monitor expenditures to ensure the program is self-sustaining.
2	Are there additional fees for follow up inspections if deficiencies are found during normal inspections?	The fee schedule does not include separate fees for reinspection.
3	I agree that the Oil & Gas industry should pay the County to monitor the industry and all wells. It should be at least quarterly, and more frequent when issues regarding the health & safety of people and the environment are found, until they are remedied, and again when a well closes or changes hands. The fees should be robust enough to cover all monitoring.	The program is designed to allow two inspections per well, per year.
4	If these fees are meant to be paid by the company doing the fracking, \$3k is a drop in the bucket for these corporations. Make it \$3 million twice a year and maybe that would make sense. I personally hope that you stop the fracking projects so close to my home and my kids school.	We can only charge reasonable expenses to cover the costs of the
5	Who's paying the fees? Better not be the taxpayer. Anyway, you sold out and it's too late for anything else. It's all about the money, no concern for the health, safety or welfare of the people. Sooooo glad our family got out of there before the next armageddon.	The oil and gas operators will pay the fees.
6	Ok with fees	
7	Who will collect these fees? Or I guess a better question is who will be the inspectors? How will we know there's no conflict of interest? Can we raise the fees? I'm not particularly excited about this project. Maybe if we raise the fees there will be less interest in going forward with the project? Or, better yet, can we reduce the fees to \$0 in exchange for moving the project out 10 miles from our houses and two elementary schools? ::AndyM::	Arapahoe County will collect the fees from oil and gas operators and inspector(s) will be Arapahoe County employees.
8	Twice a year is not sufficient during construction and first two years of operation. Monthly first two years on sites and truck inspection Twice yearly after the first two years Bob	We will coordinate inspections with the state ECMC; their inspectors often make multiple visits to sites during drilling and completion phases.
9	Who pays these fees? This is unclear on the website, email, and other information. Additionally, in the event of a shortfall (because the county has continued to cite budget shortfalls and constraints), under what circumstances would taxpayers be responsible? It would be unacceptable for taxpayers to take on any financial expenses for the wells that clearly are strongly opposed. These fees also cover inspections but what is the financial outcome when there is a failure and spill?	The oil and gas operators will pay the fees. Section 5-3.6.1 of the Land Development Code provides fines for leaks, spills, and emissions.
10	The fees should increase annually to account for inflation to be aligned with the annualized CPI. This would ensure the costs of the inspections are commiserate with the fees paid by the oil and gas company.	Fees designed to cover program costs and we will monitor expenditures to ensure the program is self-sustaining.
11	The proposed fees are not enough to protect the surrounding environment or ensure the safety of the nearby residents. No amount of fees can justify the need for this energy development. However, if development continues, the oil and gas company should pay all the inspection fees.	The oil and gas operators will pay the fees.
12	I was against any more drilling "fracking" in Arap. Co. from the beginning. I have no further comments. Polis is a pseudo Democrat.	
13	Do the fees go into a pot where they can be shared in the aftermath of the coming disasters or will they simply going into county coffers? The reality of having large numbers of oil and gas wells in your county is spills and incidents that are very harmful and costly. Will these fees be sufficient to make communities and people whole after disasters occur? What level of emergency preparedness is the county at?? Will you be able to respond to a Galetton type incident in a timely fashion?? Will there be sufficient funding for the fleet of inspectors and engineers to inspect and follow up on all of the issues that will surely occur? Who in the county has expertise across the spectrum of Oil and Gas?	The fees will cover the costs of the oil and gas inspections program. Arapahoe County regulations require operators to maintain liability insurance, including extra expense insurance of \$10 million to cover events like blowouts.
14	You give too little information for a critical analysis. What do you mean by inspection? I am opposed to any fees without knowing what an inspection entails. The ECMC inspects wells. This appears to be a prelude to proposing and levying fines.	Section 5-3.6.1 of the Land Development Code allows Arapahoe County to assess fines for leaks, spills, and emissions.
15	Inspections and fee's should double every time there is an infraction.	Section 5-3.6.1 of the Land Development Code allows Arapahoe County to assess fines for leaks, spills, and emissions.
16	Renegade Oil & Gas Company opposes this proposal. It may be illegal as routine inspection fees have been disallowed by the courts.	Noted.
17	These fees are far too low given the potential impact of drilling here. Please do not allow this project to move forward!	Fees designed to cover program costs and we will monitor expenditures to ensure the program is self-sustaining.
18	Saying you'll avoid impacts in the same sentence as saying you'll mitigate them is useless. You know you're going to cause harm and hurt people.	Noted.
19	Please charge the industry the requisite fee to keep inspectors out there with their own working equipment to test and to provide the public data that there are inspectors with monitoring data that operations will be as safe as possible. Do not let the fox monitor the hen house. Thank you.	The fees allow Arapahoe County to provide local inspections more frequently than state ECMC inspections.

20	Please charge the industry the requisite fee to keep inspectors to assure the public that this will be as safe as possible.	Fees designed to cover program costs and we will monitor expenditures to ensure the program is self-sustaining.
21	The fee schedule looks good. Please proceed!	Noted.
22	To the Arapahoe County Commissioners, I'm writing to express deep concern that the oil and gas regulations adopted in December 2024, while a step forward, "still fail to adequately protect residents, wildlife, and the environment". The increased setbacks, financial bonding, and electrification requirements are appreciated—but they are "not enough" in the face of the real risks posed by drilling in and near our communities. ### Here's what we still need: "A complete ban on drilling near schools, daycares, and residential neighborhoods." Even 1,000 feet is not a safe distance for children or families. "Expanded protection for wildlife corridors and habitat", with independent ecological assessments before any project approval. "Prohibition on any drilling near groundwater recharge zones", not just reservoirs. Our aquifers matter too. "Mandatory public hearings" before each and every permit, not just blanket approvals. "Ongoing, third-party environmental monitoring", not just self-reporting from operators or occasional county checks. These are common-sense protections, not extreme requests. If this board truly represents the people—not oil and gas interests—it must act accordingly. We've seen what happens when drilling goes wrong: polluted air, poisoned water, stressed ecosystems, and long-term health effects. I urge you to respond with a plan that goes beyond what was adopted and truly prioritizes the well-being of Arapahoe County's residents, natural spaces, and future generations. Sincerely, Shannon Starr	Noted.
23	Despite being labeled an "existing" site, the proposed actions by Civitas clearly constitute substantial new development, including the construction of a significantly larger pad, expansion of industrial operations, and the addition of new wells. This is not merely a continuation of prior use, it represents a material escalation of impact, both environmentally and legally. Any assertion to the contrary risks underestimating the scope of disturbance and mischaracterizing the nature of the project to regulators and the public. Most critically, this expansion includes drilling underneath the Aurora Reservoir, a vital municipal water source. No such activity has occurred in this sensitive area to date, meaning the County still possesses both the authority and responsibility to intervene. Proceeding without thorough, independent hydrological and environmental review exposes the County and operators to liability for any degradation to water quality or disruptions to the reservoir's integrity. Moreover, the cumulative impacts of intensive development within Lowry Ranch, especially with multiple proposed "mega-pads" containing 15 or more wells each should be adequately analyzed under NEPA, CEQA, or comparable state-level environmental review standards. Ignoring cumulative effects in such a high-density development area opens the door to legal challenge on the grounds of segmented and insufficient environmental review, which has been the basis for injunctive relief in similar cases across the country. Additionally, emergency response capability appears to be severely underestimated. The Bennett-Watkins Fire Protection District, a small and geographically distant agency, is already stretched thin in its coverage. It is being tasked with oversight of several fracking sites, including La Plata South. Other than stating that there will be a road for emergency personnel to get to La Plata south site, the current application that fire hazard risk lacks evidence that the plan has been adequately modeled, mitigated, or supported by appropriate interagency response planning. This oversight leaves both the operator and local authorities vulnerable to claims of negligence in the event of a fire or explosion. In conclusion, proceeding with this project without rigorous environmental, safety, and cumulative impact assessments constitutes a clear legal risk. Any future harms tied to water contamination, fire hazard, or insufficient regulatory review will be traceable to decisions made now, when there is still an opportunity to act. Advancing without addressing these gaps exposes all responsible parties to foreseeable, and potentially actionable, liability.	These comments appear to be directed towards the proposed State La Plata South oil and gas pad site.
24	I urge the County to charge the industry higher requisite fees that are necessary to keep inspectors in the field to ensure public safety. This is critical, oversight should not be underfunded or compromised. We need a robust, well-resourced inspection program, and that means higher industry fees. These inspections are the backbone of public trust and environmental safety. Cutting corners on oversight simply isn't acceptable. Please prioritize public health and safety by ensuring inspectors are adequately funded and present. Don't allow the industry to continue writing the script.	Fees designed to cover program costs and we will monitor expenditures to ensure the program is self-sustaining.
25	Comments from the City of Aurora. Thank you for the opportunity to comment on your new inspection program. We fully support the initiation of your program, and in Aurora, we have found that the use of an oil and gas inspector is essential for confirming Operator compliance. Authority for local governments to charge inspection fees derives from C.R.S. 29-20-104(2)(c) which states local governments can "Impose fees on operators or owners to cover the reasonably foreseeable direct and indirect costs of permitting and regulation and the costs of any monitoring and inspection program necessary to address the impacts of development and to enforce local governmental requirements..." We recommend you calculate the total income you will generate from your fee structure and confirm that it meets the "reasonably foreseeable direct and indirect costs" hurdle. You may need to run sensitivities on different combinations of fees per site and per well, and compare that with the total cost of your inspection program. Your current proposal matches the fee structure used by Aurora, however, in Aurora we have almost exclusively multi-well pads, and we are not sure if that matches your situation. According to ECMC data, Arapahoe County has 241 active wells (i.e. outside of Aurora), which is a similar number of wells inside Aurora. You are only planning to inspect half as frequently as Aurora, so that will factor into your costs as well. We will gladly share our knowledge and inspection protocols with Arapahoe County if you like, once your program begins. Sincerely, Jeffrey S. Moore, P.G. Manager, Energy & Environment Division City of Aurora	Noted.
26	Arapahoe County needs to charge the Oil and Gas industry higher requisite fees to keep inspectors in the field to ensure public safety. The inspections program should not be underfunded or compromised. Cutting corners on oversight simply isn't acceptable. Please prioritize public health although the county has already shown many times that they are okay with taking Oil and Gas money for the safety of the residents. Do not allow the oil and gas industry to continue controlling everything. We need the inspections for public trust and environmental safety.	Fees designed to cover program costs and we will monitor expenditures to ensure the program is self-sustaining.
27	These fees seem wildly low for proper oversight. Aside from the health of the residents, you need to protect the land and wildlife that exists in these areas. "Site reclamation" does not heal the damage done to all of the displaced wildlife, and it certainly will not bring it back to the way it currently is. Are you people actually doing your jobs and reading the studies on all of the damage that fracking does to literally everything (land, water, animals, PEOPLE) around it? Your setbacks are nowhere near far enough. Your regulations and proposals show that you're just spewing out what the oil companies are feeding you instead of actually using your brains... or maybe you just don't care... Please show us you're listening and that you care! The majority of people who actually live near these proposed sites are opposed to this. The solution isn't more regulation (and we all know there isn't enough man power or money for that anyway), the solution is to SAY NO.	Fees designed to cover program costs and we will monitor expenditures to ensure the program is self-sustaining.

28	To the Board of County Commissioners, Given the elevated risk of public water contamination inherent in this and other fracking proposals currently under the County's consideration, I and my fellow Aurora residents do not believe that this fee schedule is stringent or regular enough to ensure compliance and care on the part of Civitas. The County states that it will "prioritize [inspections] based upon the proximity of the wells to where residents live," but there is no indication of what that means in practical terms. The fees themselves are pocket change for a company as large as Civitas, especially given how much they stand to profit from the use of our city's land, infrastructure, and drinking water. Additionally, given the fact that Arapahoe County has declined public hearings and accountability in approving the State Sunlight Long application even after record-setting public outcry, I do not have faith in the County to effectively prioritize inspections and place protective restrictions on Civitas' activities near the reservoir. Sincerely, Kelsi Long Aurora, CO	Fees designed to cover program costs and we will monitor expenditures to ensure the program is self-sustaining.
29	Being well aware of labor, materials and lab costs today, this fee structure doesn't appear nearly adequate to cover the backend administration and field work needed to ensure a meaningful program. Fees should be significantly higher with an annual 3-4% escalation to mitigate risk of tough Board choices between using other county resources to cover shortfalls (inevitable with this proposed structure) or worse, cutting actual inspection resources themselves. So let's get this right from the start to ensure we have the resources for a fulsome program that protects our environment and our families (YOUR CONSTITUENTS - WE ARE ALL PAYING ATTENTION!). Thank you, sincerely, Andrew Segrest (SE Aurora - Southshore)	Fees designed to cover program costs and we will monitor expenditures to ensure the program is self-sustaining.
30	I am a resident who will be affected by the Oil and Gas development in Arapahoe County close to Aurora Reservoir. The proposed fee information does not specify if this will cover the cost for comprehensive inspections. The wells approved near the reservoir are a real health hazard for the residents that the many County officials, elected and otherwise, do not seem to care about. The proposed fees should cover the cost of inspections and overhead if the county is serious about the plan. The county should have provided more details on the budget needed and next steps to address hazards found in inspection. A lot of these "regulations" do not have any teeth in Colorado as is evidenced by the spills and leaks in other areas with drilling.	Fees designed to cover program costs and we will monitor expenditures to ensure the program is self-sustaining.
31	Please see comment: Being well aware of labor, materials and lab costs today, this fee structure doesn't appear adequate to cover the backend administration and field work needed to ensure a meaningful program. Fees should be significantly higher with an annual 3-4% escalation to mitigate risk of tough Board choices between using other county resources to cover shortfalls (inevitable with this proposed structure) or worse, cutting actual inspection resources themselves. Let's get this right from the start to ensure we have the resources for a fulsome program that protects our environment and our families (YOUR CONSTITUENTS), we are paying attention. Thank you and sincerely, Stephanie Blum	Fees designed to cover program costs and we will monitor expenditures to ensure the program is self-sustaining.
32	An inspection program misses the point entirely. We should not be relying on oil and gas. We need to move toward clean energy with wind and solar. Fossil fuels have run their course and done immeasurable damage to the planet. Reconsider investing tax payer dollars in this way. Fund clean energy instead.	
33	Dear Arapahoe County, I urge the County to charge the industry higher requisite fees to keep inspectors in the field to ensure public safety. This is critical and oversight should not be underfunded or compromised. We need a robust, well-resourced inspection program, and that means higher industry fees. These inspections are the backbone of public trust and environmental safety. Cutting corners on oversight simply isn't acceptable. Please prioritize public health and safety by ensuring inspectors are adequately funded and present. Don't allow the industry to continue writing the script. Regards, Shari Scalone Concerned resident	Fees designed to cover program costs and we will monitor expenditures to ensure the program is self-sustaining.
34	Please keep the wells away from our neighbor, South Shore! We do not need checks. We need prevention in these wells being placed so close to homes, schools, and parks are children playing in. Please please consider moving the Wells elsewhere.	
35	Dear Arapahoe County Public Works; You will have a shortfall of \$9296 per well if you charge the listed fees. For the Lowry CAP alone, that is a total shortfall of \$1.5 million per year. Based on Broomfield County's inspection expense report, they spend approximately \$10k per well per year, inclusive of active and shut wells. It is truly a gift to have actual data from another County; you would be misguided to ignore their experience. You should charge \$10,796 per well per year, as these are the actual inspection costs.	Fees designed to cover program costs and we will monitor expenditures to ensure the program is self-sustaining.
36	Due to the large number of oil and gas wells proposed on the Lowry Ranch CAP, the County is going to need a full time person dedicated to doing inspections there on a daily basis. Visiting each drilling site twice a year, within unincorporated Arapahoe County, is insufficient. As we all know, Civitas/Crestone commits violations after violations, as ECMC has noted. IF this inspection program is to be effective, a full time staff person, with adequate qualifications, training, equipment and benefits, will need to be hired. The County had told us that the inspection program would begin July 1st, in a few weeks. There is a lot of groundwork necessary to put together an effective inspection program. The fees currently proposed are way too low. We know that the operators can afford a much larger fee. The tax payers should not be responsible for inspecting and monitoring these wells. The County needs to charge the operator for the opportunity to drill by our homes, schools and Reservoir. If this program is truly "geared to provide further protection of public health, safety, welfare and the environment..." please raise the necessary fees accordingly. \$3,000 per pad and \$1,500 per well is absurd. Our community is sick and tired of the County putting industry/profits over people. Show us that you truly care about our safety and well being by charging fees that adequately address the high risk that fracking poses to all of us. Do your research, as we have already done, and find out what other communities are doing to protect their constituents. It is obvious to us that you are making these decisions to drill nearby a densely populated residential community, and nearby our precious water resources, so now take on the responsibility to establish an inspection program that will assure us that you made the right decision to drill. It is not our responsibility to protect ourselves. It is yours. Marsha Goldsmith Kamin	Fees designed to cover program costs and we will monitor expenditures to ensure the program is self-sustaining.
38	1) The fee schedule is ambiguous because multiple wells (often 20 or more) may be located on a single pad. Is it \$1,500 per well AND \$3,000 per pad, or is it \$1,500 per well UP TO a maximum of \$3,000 per pad? 2) A re-inspection fee should be added because it may often become necessary to return and re-inspect if there was an unresolved issue observed, if the operator did not have all information required to conduct the inspection, or if for any other reason a follow-up inspection was required.	The proposed fees are \$3,000 per pad, plus \$1,500 per well on that pad.
39	Your inspection fee should be per well, not per pad. A pad with 3 wells is not equal to a pad with 30 wells. Keep in mind inflation and growing wages as well as the need for multiple inspectors at the pace you keep recklessly approving new o&g locations. You will not recuperate enough funds if you don't set high enough fees.	The proposed fees are \$3,000 per pad, plus \$1,500 per well on that pad.

41	Dear Arapahoe County Public Works; These fees appear to be inadequate. There will be a shortfall of \$9296 per well if charging the listed fees. For the Lowry CAP alone, that is a total shortfall of \$1.5 million per year. Based on Broomfield County's inspection expense report, they spend approximately \$10k per well per year, inclusive of active and shut wells. It is truly a gift to have actual data from another County; you would be misguided to ignore their experience. You should charge \$10,796 per well per year, as these are the actual inspection costs. Thank you, Kristin Price	Fees designed to cover program costs and we will monitor expenditures to ensure the program is self-sustaining.
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