

Chris Laramie

From: Jeff Baker
Sent: Thursday, July 18, 2024 12:07 PM
To: Chris Laramie
Subject: FW: Deny 5-Mile Pipeline for Secret Stash

From: Jennifer Lowy <noreply@adv.actionnetwork.org>
Sent: Thursday, July 18, 2024 10:53 AM
To: Jeff Baker <JBaker@arapahoegov.com>
Subject: Deny 5-Mile Pipeline for Secret Stash

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Commissioner Jeff Baker,

Project Summary

GMT Exploration Company LLC is requesting to expand the current Tenderfoot pipeline to transport oil, gas and water to and from the proposed Secret Stash well pad (a location with multiple wells). It will transport oil, gas and produced water 5.10 miles on the State Land Board property.

Reasoning For Denial of Request

The Secret Stash well pad that the Tenderfoot pipeline would serve has not yet been approved. The pipeline approval process should begin after the well pad approval process, since the pipeline application assumes the existence of wells. This order of operations would make the most efficient use of the County's time and resources.

The proposed Secret Stash well pad and pipeline are sited within an area that is being considered for a large-scale project called the Lowry Ranch Comprehensive Area Plan (CAP). The Lowry Ranch CAP project will add approximately 156 wells and over seven pad locations in roughly a 65-square-mile area. If approved, the large-scale project would produce emissions that will degrade air quality and continue exacerbating the ozone issues. Adding more oil and gas extraction projects to an area that has already been flagged by the United States Environmental Protection Agency for poor air quality is reckless. Cumulative impacts

concerning safeguarding health and the environment should be considered for each and every oil and gas application in this area.

The Bennett-Watkins volunteer fire department, which is located more than 20 miles from the proposed site, is expected to handle any fire or hazmat issues that might occur from the pipeline. Water access in the area is minimal and will compound fire issues. In this “water-poor” area, secondary fires are the biggest concern. The County should not approve a project when there is no infrastructure to safeguard residents from the dangerous fire hazards that commonly occur from such projects.

Borings under drainages to river/stream features/tranches will remain open in the autumn along the north fence of County Line Road. These features mean the pipeline will compromise more of the Open Space Natural areas of Arapahoe County on which wildlife is dependent.

GMT proposes to evade baseline water sampling or subsequent sampling of water at or near the well pad. This baseline sampling must be performed in order to assess if a release of oil and gas and/or produced water has affected one or more of the groundwater aquifers located above the Location and horizontal well field.

GMT has no existing or previous O&G facilities in Colorado and they have no published Corporate Sustainability Report or other documents to demonstrate their Environment, Health and Safety (EHS) compliance record. The GMT website lists the company value at just over \$306 Million. The lack of Colorado experience and limited balance sheet should be a red flag for the County and GMT should not be permitted to develop an O&G facility so close to hundreds of residents and environmental receptors. Operators routinely dump their responsibility for the life of wells by divesting prior to capping and sealing wells.

The GMT plan is to inject over 500,000 million gallons of freshwater to develop the 20 proposed HF wells. It is not clear how many gallons of produced water will be generated from the total of 20 wells for the Location. The produced water will likely be injected into salt water disposal wells in Weld County, which has numerous active faults and a serious induced seismicity problem. GMT will simply move their produced water problem from one county to another in Colorado rather than recycling it.

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hazardous material can leak over three months. A continuous monitoring system should be in place and if this is not possible, the pipeline should be denied. Furthermore, an explicit remediation method, timeline and consequences should be delineated in the application, not left to the discretion of the operator.

Required wildlife surveys have not been conducted for the proposed pipeline area. Protected raptors are known to nest in the area and these nests have not yet been documented. The pipeline crosses a mule deer winter concentration area and a pronghorn winter concentration area, which are designated High Priority Habitats by Colorado Parks and Wildlife. High Priority Habitats require cessation of human activity from Dec 1-April 30 for mule deer and Jan 1-April 30 for pronghorns. 0.15 miles of pipe is within mule deer protected habitat and 3.5 miles of pipe are within pronghorn habitat. It would be impossible for this pipeline to comply with the requirements of the High Priority Habitat.

As presented in Table 3.12-8, there is potentially suitable habitat for burrowing owl in the Project area, which cannot be avoided. Additionally, occurrence data obtained from the State Land Board ARAPAHOE COUNTY PRE-SUBMITTAL NO. Q23-088 USR WITH 1041 APPLICATION Secret Stash Well Connect Project 50 December 2023 indicates that burrowing owls are present in the Project vicinity. The Applicant has not consulted with CPW regarding burrowing owls and potential measures that can be implemented to minimize impacts during construction. Burrowing owls' nest from March 15 to August 31. CPW recommends no encroachment within 660 feet of a nest site during this time. It will be impossible for the pipeline to avoid encroachment if it travels along the path as proposed.

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The nearest known seismic fault is the Rampart Range, located approximately 28 miles southwest of the Project (USGS,2023a). Seismic studies should be done prior to new drilling to ensure public safety. These studies should be published for public access.

Action

We respectfully ask that the Board of County Commissioners deny the project based on the fact that the totality of pending projects in the area have not been considered, nor have the proper baseline studies been completed. In addition, due to this pipeline failing to comply with

the requirements of the High Priority Habitat through which it travels, this project should be denied.

Jennifer Lowy

jen.l.lowy@gmail.com

27964 E Indore Dr

Aurora District, Colorado 80016

Chris Laramie

From: Jeff Baker
Sent: Thursday, July 18, 2024 6:30 AM
To: Chris Laramie; Jason Reynolds
Subject: FW: Deny 5-Mile Pipeline for Secret Stash

FYI. Forwarding a number of these to you.

From: Joshua Pollock <noreply@adv.actionnetwork.org>
Sent: Thursday, July 18, 2024 2:03 AM
To: Jeff Baker <JBaker@arapahoegov.com>
Subject: Deny 5-Mile Pipeline for Secret Stash

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Commissioner Jeff Baker,

Dear Commissioners,

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Reasoning For Denial of Request:

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The proposed Secret Stash well pad and pipeline are sited within an area that is being considered for a large-scale project called the Lowry Ranch Comprehensive Area Plan (CAP). The Lowry Ranch CAP project will add approximately 156 wells and over seven pad locations in roughly a 65-square-mile area. If approved, the large-scale project would produce emissions that will degrade air quality and continue exacerbating the ozone issues. Adding more oil and gas extraction projects to an area that has already been flagged by the United

States Environmental Protection Agency for poor air quality is reckless. Cumulative impacts concerning safeguarding health and the environment should be considered for each and every oil and gas application in this area.

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Borings under drainages to river/stream features/tranches will remain open in the autumn along the north fence of County Line Road. These features mean the pipeline will compromise more of the Open Space Natural areas of Arapahoe County on which wildlife is dependent.

GMT proposes to evade baseline water sampling or subsequent sampling of water at or near the well pad. This baseline sampling must be performed in order to assess if a release of oil and gas and/or produced water has affected one or more of the groundwater aquifers located above the Location and horizontal well field.

GMT has no existing or previous O&G facilities in Colorado and they have no published Corporate Sustainability Report or other documents to demonstrate their Environment, Health and Safety (EHS) compliance record. The GMT website lists the company value at just over \$306 Million. The lack of Colorado experience and limited balance sheet should be a red flag for the County and GMT should not be permitted to develop an O&G facility so close to hundreds of residents and environmental receptors. Operators routinely dump their responsibility for the life of wells by divesting prior to capping and sealing wells.

The GMT plan is to inject over 500,000 million gallons of freshwater to develop the 20 proposed HF wells. It is not clear how many gallons of produced water will be generated from the total of 20 wells for the Location. The produced water will likely be injected into salt water disposal wells in Weld County, which has numerous active faults and a serious induced seismicity problem. GMT will simply move their produced water problem from one county to another in Colorado rather than recycling it.

The proposed leak inspection schedule of every three months is dangerous to citizens. Pipeline leaks are the most common cause of toxic spills from extraction in Colorado. A lot of hazardous material can leak over three months. A continuous monitoring system should be in place and if this is not possible, the pipeline should be denied. Furthermore, an explicit remediation method, timeline and consequences should be delineated in the application, not left to the discretion of the operator.

Required wildlife surveys have not been conducted for the proposed pipeline area. Protected raptors are known to nest in the area and these nests have not yet been documented. The pipeline crosses a mule deer winter concentration area and a pronghorn winter concentration area, which are designated High Priority Habitats by Colorado Parks and Wildlife. High Priority Habitats require cessation of human activity from Dec 1-April 30 for mule deer and Jan 1-April 30 for pronghorns. 0.15 miles of pipe is within mule deer protected habitat and 3.5 miles of pipe are within pronghorn habitat. It would be impossible for this pipeline to comply with the requirements of the High Priority Habitat.

As presented in Table 3.12-8, there is potentially suitable habitat for burrowing owl in the Project area, which cannot be avoided. Additionally, occurrence data obtained from the State Land Board ARAPAHOE COUNTY PRE-SUBMITTAL NO. Q23-088 USR WITH 1041 APPLICATION Secret Stash Well Connect Project 50 December 2023 indicates that burrowing owls are present in the Project vicinity. The Applicant has not consulted with CPW regarding burrowing owls and potential measures that can be implemented to minimize impacts during construction. Burrowing owls' nest from March 15 to August 31. CPW recommends no encroachment within 660 feet of a nest site during this time. It will be impossible for the pipeline to avoid encroachment if it travels along the path as proposed.

Additional features must be added to the pipeline proposal to allow access to existing public use areas. The exact location of the pipeline must be specified so that alterations to trails can be accounted for. This must be agreed on in advance so that financial responsibility for trail expansion falls to GMT and is not borne by the County.

The nearest known seismic fault is the Rampart Range, located approximately 28 miles southwest of the Project (USGS,2023a). Seismic studies should be done prior to new drilling to ensure public safety. These studies should be published for public access.

Requested Action:

We respectfully ask that the Board of County Commissioners deny the project based on the

fact that the totality of pending projects in the area have not been considered, nor have the proper baseline studies been completed. In addition, due to this pipeline failing to comply with the requirements of the High Priority Habitat through which it travels, this project should be denied.

Regards,

Joshua Pollock

Joshua Pollock

jpollock18@gmail.com

26652 E Hinsdale Pl

Aurora, Colorado 80016

Chris Laramie

From: Jeff Baker
Sent: Friday, July 19, 2024 9:55 AM
To: Chris Laramie
Subject: Fwd: Deny 5-Mile Pipeline for Secret Stash

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From: Katina Rupeka <noreply@adv.actionnetwork.org>
Sent: Friday, July 19, 2024 9:26 AM
To: Jeff Baker <JBaker@arapahogov.com>
Subject: Deny 5-Mile Pipeline for Secret Stash

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Commissioner Jeff Baker,

Dear Commisioners and those involved in the decision making of this project,

I would like to send this letter to each of you to please deny this project's request. If this were occurring in your backyard and affecting your health, your children's health and the wildlife and environment's health, you would clearly see why we have so much concern and why this project should be stopped.

As you are well aware, GMT Exploration Company LLC is requesting to expand the current Tenderfoot pipeline to transport oil, gas and water to and from the proposed Secret Stash well pad (a location with multiple wells). It will transport oil, gas and produced water 5.10 miles on the State Land Boards. Thank goodness, the Secret Stash well pad that the Tenderfoot pipeline would serve has not yet been approved. The pipeline approval process should begin after the well pad approval process, since the pipeline application assumes the existence of wells.

This order of operations would make the most efficient use of the County's time and resources. The proposed Secret Stash well pad and pipeline are sited within an area that is being considered for a large-scale project called the Lowry Ranch Comprehensive Area Plan

(CAP). The Lowry Ranch CAP project will add approximately 156 wells and over seven pad locations in roughly a 65-square-mile area. If approved, the large-scale project would produce emissions that will degrade air quality and continue exacerbating the ozone issues. Adding more oil and gas extraction projects to an area that has already been flagged by the United States Environmental Protection Agency for poor air quality is reckless. Cumulative impacts concerning safeguarding health and the environment should be considered for each and every oil and gas application in this area.

The Bennett-Watkins volunteer fire department, which is located more than 20 miles from the proposed site, is expected to handle any fire or hazmat issues that might occur from the pipeline. Water access in the area is minimal and will compound fire issues. In this “water-poor” area, secondary fires are the biggest concern. The County should not approve a project when there is no infrastructure to safeguard residents from the dangerous fire hazards that commonly occur from such projects.

Borings under drainages to river/stream features/tranches will remain open in the autumn along the north fence of County Line Road. These features mean the pipeline will compromise more of the Open Space Natural areas of Arapahoe County on which wildlife is dependent.

GMT proposes to evade baseline water sampling or subsequent sampling of water at or near the well pad. This baseline sampling must be performed in order to assess if a release of oil and gas and/or produced water has affected one or more of the groundwater aquifers located above the Location and horizontal well field.

GMT has no existing or previous O&G facilities in Colorado and they have no published Corporate Sustainability Report or other documents to demonstrate their Environment, Health and Safety (EHS) compliance record. The GMT website lists the company value at just over \$306 Million. The lack of Colorado experience and limited balance sheet should be a red flag for the County and GMT should not be permitted to develop an O&G facility so close to hundreds of residents and environmental receptors. Operators routinely dump their responsibility for the life of wells by divesting prior to capping and sealing wells.

The GMT plan is to inject over 500,000 million gallons of freshwater to develop the 20 proposed HF wells. It is not clear how many gallons of produced water will be generated from the total of 20 wells for the Location. The produced water will likely be injected into salt water

disposal wells in Weld County, which has numerous active faults and a serious induced seismicity problem. GMT will simply move their produced water problem from one county to another in Colorado rather than recycling it.

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The nearest known seismic fault is the Rampart Range, located approximately 28 miles southwest of the Project (USGS,2023a). Seismic studies should be done prior to new drilling to ensure public safety. These studies should be published for public access.

In good conscious, I respectfully ask that the Board of County Commissioners deny the project based on the fact that the totality of pending projects in the area have not been considered, nor have the proper baseline studies been completed. In addition, due to this pipeline failing to comply with the requirements of the High Priority Habitat through which it travels, this project should be denied.

Thank you for your time and willingness to look at the perspective of your good citizens. Thank you also for considering our environment that makes our State of Colorado so beautiful!

Sincerely,
Katina Rupeka

Katina Rupeka
krupeka1@gmail.com
27821 E Long PI
Aurora District, Colorado 80016

Chris Laramie

From: Jeff Baker
Sent: Thursday, July 18, 2024 6:32 AM
To: Chris Laramie
Subject: FW: Deny 5-Mile Pipeline for Secret Stash

From: Kevin Chan <noreply@adv.actionnetwork.org>
Sent: Wednesday, July 17, 2024 11:33 PM
To: Jeff Baker <JBaker@arapahoegov.com>
Subject: Deny 5-Mile Pipeline for Secret Stash

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Kevin Chan

kevchan85@gmail.com

27424 E Roxbury Pl

Aurora District, Colorado

Chris Laramie

From: Jeff Baker
Sent: Thursday, July 18, 2024 3:25 PM
To: Chris Laramie
Subject: FW: Deny 5-Mile Pipeline for Secret Stash

From: Lanissa Larsen <noreply@adv.actionnetwork.org>
Sent: Thursday, July 18, 2024 1:31 PM
To: Jeff Baker <JBaker@arapahoegov.com>
Subject: Deny 5-Mile Pipeline for Secret Stash

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Lanissa Larsen

lanissarhodes@yahoo.com

7162 S Waterloo Way

Aurora District, Colorado 80016

Chris Laramie

From: Jeff Baker
Sent: Thursday, July 18, 2024 6:37 AM
To: Kendra Davis; Michelle Halstead
Cc: Jason Reynolds; Chris Laramie; Carrie Warren-Gully
Subject: FW: Tenderfoot Pipeline Hearing on 7/23/24

Kendra and Michelle,

I'm just double checking that remote participation in the Tenderfoot Pipeline Hearing on Tuesday will allow for public comments.

-Jeff-

From: Jeff Baker
Sent: Thursday, July 18, 2024 6:35 AM
To: Marsha Kamin <marshagkamin@comcast.net>; Jason Reynolds <JReynolds@arapahoegov.com>
Cc: kevchan85@gmail.com; Randy Willard <rjw41x@gmail.com>; raquelitabraver@gmail.com; Kamin, Mark <markgkamin@gmail.com>
Subject: RE: Tenderfoot Pipeline Hearing on 7/23/24

Hi Marsha, The norm is for people attending via virtual/phone will be able to comment so I would be surprised if that were not the case. I will double check to make sure and respond back to you and those on the cc line.

-Jeff-

From: Marsha Kamin <marshagkamin@comcast.net>
Sent: Wednesday, July 17, 2024 8:54 PM
To: Jeff Baker <JBaker@arapahoegov.com>; Jason Reynolds <JReynolds@arapahoegov.com>
Cc: kevchan85@gmail.com; Randy Willard <rjw41x@gmail.com>; raquelitabraver@gmail.com; Kamin, Mark <markgkamin@gmail.com>
Subject: Tenderfoot Pipeline Hearing on 7/23/24

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Hi Commissioner Baker,

Quick question; for the GMT Exploration Tenderfoot Pipeline Hearing on 7/23/24, will call in public comments be taken as well as those who are there in person? We have several community members asking if they will be able to call into the Hearing since they are working during the daytime hours and cannot attend the hearing.

Please let us know so that we can let the community know as well.

Thank you,

Marsha Goldsmith Kamin

Chris Laramie

From: Jeff Baker
Sent: Thursday, July 18, 2024 3:32 PM
To: Chris Laramie
Subject: FW: Deny 5-Mile Pipeline for Secret Stash

From: Rachel Markowitz <noreply@adv.actionnetwork.org>
Sent: Thursday, July 18, 2024 12:54 PM
To: Jeff Baker <JBaker@arapahoegov.com>
Subject: Deny 5-Mile Pipeline for Secret Stash

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Commissioner Jeff Baker,

Project Summary

GMT Exploration Company LLC is requesting to expand the current Tenderfoot pipeline to transport oil, gas and water to and from the proposed Secret Stash well pad (a location with multiple wells). It will transport oil, gas and produced water 5.10 miles on the State Land Board property.

Reasoning For Denial of Request

The Secret Stash well pad that the Tenderfoot pipeline would serve has not yet been approved. The pipeline approval process should begin after the well pad approval process, since the pipeline application assumes the existence of wells. This order of operations would make the most efficient use of the County's time and resources.

The proposed Secret Stash well pad and pipeline are sited within an area that is being considered for a large-scale project called the Lowry Ranch Comprehensive Area Plan (CAP). The Lowry Ranch CAP project will add approximately 156 wells and over seven pad locations in roughly a 65-square-mile area. If approved, the large-scale project would produce emissions that will degrade air quality and continue exacerbating the ozone issues. Adding more oil and gas extraction projects to an area that has already been flagged by the United States Environmental Protection Agency for poor air quality is reckless. Cumulative impacts

concerning safeguarding health and the environment should be considered for each and every oil and gas application in this area.

The Bennett-Watkins volunteer fire department, which is located more than 20 miles from the proposed site, is expected to handle any fire or hazmat issues that might occur from the pipeline. Water access in the area is minimal and will compound fire issues. In this “water-poor” area, secondary fires are the biggest concern. The County should not approve a project when there is no infrastructure to safeguard residents from the dangerous fire hazards that commonly occur from such projects.

Borings under drainages to river/stream features/tranches will remain open in the autumn along the north fence of County Line Road. These features mean the pipeline will compromise more of the Open Space Natural areas of Arapahoe County on which wildlife is dependent.

GMT proposes to evade baseline water sampling or subsequent sampling of water at or near the well pad. This baseline sampling must be performed in order to assess if a release of oil and gas and/or produced water has affected one or more of the groundwater aquifers located above the Location and horizontal well field.

GMT has no existing or previous O&G facilities in Colorado and they have no published Corporate Sustainability Report or other documents to demonstrate their Environment, Health and Safety (EHS) compliance record. The GMT website lists the company value at just over \$306 Million. The lack of Colorado experience and limited balance sheet should be a red flag for the County and GMT should not be permitted to develop an O&G facility so close to hundreds of residents and environmental receptors. Operators routinely dump their responsibility for the life of wells by divesting prior to capping and sealing wells.

The GMT plan is to inject over 500,000 million gallons of freshwater to develop the 20 proposed HF wells. It is not clear how many gallons of produced water will be generated from the total of 20 wells for the Location. The produced water will likely be injected into salt water disposal wells in Weld County, which has numerous active faults and a serious induced seismicity problem. GMT will simply move their produced water problem from one county to another in Colorado rather than recycling it.

The proposed leak inspection schedule of every three months is dangerous to citizens. Pipeline leaks are the most common cause of toxic spills from extraction in Colorado. A lot of

hazardous material can leak over three months. A continuous monitoring system should be in place and if this is not possible, the pipeline should be denied. Furthermore, an explicit remediation method, timeline and consequences should be delineated in the application, not left to the discretion of the operator.

Required wildlife surveys have not been conducted for the proposed pipeline area. Protected raptors are known to nest in the area and these nests have not yet been documented. The pipeline crosses a mule deer winter concentration area and a pronghorn winter concentration area, which are designated High Priority Habitats by Colorado Parks and Wildlife. High Priority Habitats require cessation of human activity from Dec 1-April 30 for mule deer and Jan 1-April 30 for pronghorns. 0.15 miles of pipe is within mule deer protected habitat and 3.5 miles of pipe are within pronghorn habitat. It would be impossible for this pipeline to comply with the requirements of the High Priority Habitat.

As presented in Table 3.12-8, there is potentially suitable habitat for burrowing owl in the Project area, which cannot be avoided. Additionally, occurrence data obtained from the State Land Board ARAPAHOE COUNTY PRE-SUBMITTAL NO. Q23-088 USR WITH 1041 APPLICATION Secret Stash Well Connect Project 50 December 2023 indicates that burrowing owls are present in the Project vicinity. The Applicant has not consulted with CPW regarding burrowing owls and potential measures that can be implemented to minimize impacts during construction. Burrowing owls' nest from March 15 to August 31. CPW recommends no encroachment within 660 feet of a nest site during this time. It will be impossible for the pipeline to avoid encroachment if it travels along the path as proposed.

Additional features must be added to the pipeline proposal to allow access to existing public use areas. The exact location of the pipeline must be specified so that alterations to trails can be accounted for. This must be agreed on in advance so that financial responsibility for trail expansion falls to GMT and is not borne by the County.

The nearest known seismic fault is the Rampart Range, located approximately 28 miles southwest of the Project (USGS,2023a). Seismic studies should be done prior to new drilling to ensure public safety. These studies should be published for public access.

Action

We respectfully ask that the Board of County Commissioners deny the project based on the fact that the totality of pending projects in the area have not been considered, nor have the proper baseline studies been completed. In addition, due to this pipeline failing to comply with

the requirements of the High Priority Habitat through which it travels, this project should be denied.

Rachel Markowitz

raquelitabraver@gmail.com

7113 S. Uriah St.

Aurora District, Colorado 80016

Chris Laramie

From: Jeff Baker
Sent: Thursday, July 18, 2024 6:30 AM
To: Chris Laramie
Subject: FW: Deny 5-Mile Pipeline for Secret Stash

From: Shari Scalone <noreply@adv.actionnetwork.org>
Sent: Thursday, July 18, 2024 2:01 AM
To: Jeff Baker <JBaker@arapahogov.com>
Subject: Deny 5-Mile Pipeline for Secret Stash

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Requested Action:

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fact that the totality of pending projects in the area have not been considered, nor have the proper baseline studies been completed. In addition, due to this pipeline failing to comply with the requirements of the High Priority Habitat through which it travels, this project should be denied.

Regards,

Shari Scalone

Shari Scalone

Shari.scalone@gmail.com

26652 E Hinsdale Pl

Aurora, Colorado 80016