

Received via email: 12/11/2014

Good Morning Brent,

Maggie Zaback suggested I submit my prepared comments concerning the draft growth policy in advance of next week's meeting:

I have been a full time resident of Red Lodge for two years, but my family have been residents of Red Lodge for 40 years.

I am also a member of the Carbon County Resource Council.

I would like to comment on our proposed change in Goal 3; specifically 3.2.b. Updating the current emergency operations program must be more specific. Our proposed changes speak directly to the intent of Goal 3 which is to avoid extra costs to the county and to avoid potential draining of county services during the permitting process. This is crucial as more energy developers operate in Carbon County.

Our proposed change adds additional new wording to the existing language. It is:
"continued training, necessary disclosure and liability measures for the changing needs of the county as they come."

A risk analysis should be performed to determine what specific training first responders will need to respond to a well site incident. If it is a fire, odds are our fire departments may not have adequate training or proper equipment to extinguish a natural gas fire. Odds are that the developer will have to be onsite to isolate the source of the fire. In some cases the source of the fire can not be determined because of the smoke and flames. It would not be unreasonable to require energy developers to foot the bill for new and extensive training. If they are not required to do so the costs associated to this training will have a significant financial impact to the county. Many of the county emergency responders are volunteers. This may not be what they signed up for.

Disclosure from an energy developer is crucial and should be part of the permitting process. If the incident is a fire and a hazardous chemical release, emergency response becomes more complicated. The smoke alone at a well site is toxic. Firefighters and emergency response teams must know what chemicals they are dealing with. Many chemicals common at well sites are an immediate threat to responders. Hydrogen sulfide and hydrofluoric acid are deadly. The government requires that any chemical manufacturer produce and provide information concerning the chemicals they manufacture with a material safety data sheet. Any energy developer should be required to furnish MSDS for every chemical at the well site. This information is crucial to the health and safety of the responders and the neighboring community. Energy developers should not be allowed to hide behind the cloak of proprietary information. Full disclosure should be mandatory.

Response time is crucial and will be an issue in Carbon County. Well sites should be in isolated areas which will cause response delays. Weather is always an issue, our emergency responders

are spread pretty thin. It is difficult to imagine how emergency responders would attend to simultaneous incidents. The potential is greater as each new well is drilled. How would one incident be prioritized over another? These situations will have a direct impact on the emergency services Carbon County taxpayers expect.

Liability should not be debatable, but it usually is. The owner of the well site is expected to be liable, but it is easy to cast blame in another direction, especially if you have the resources to do so. An energy developer could challenge the efficiency of our county emergency response to an incident they consider inadequate. Emergency responders may seek redress from the county due to fighting fires they were not adequately trained to respond to.

Energy developers abandon wells or file for bankruptcy. Potential liability must be clearly defined and addressed. It should also be part of the permitting process.

If Carbon County will be permitting energy developers to do business in our county then we must be proactive in addressing these issues before and not after energy development continues.

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