

DISTRICT COURT, LARIMER COUNTY, COLORADO Address: 201 La Porte Avenue, Suite 100 Fort Collins, CO 80521 Phone: 970.494.3500	DATE FILED: February 13, 2014 9:10 AM FILING ID: 4FECA29E71CC0 CASE NUMBER: 2013CV31385 ▲ COURT USE ONLY ▲
PLAINTIFF: COLORADO OIL & GAS ASSOCIATION v. DEFENDANT: CITY OF FORT COLLINS, COLORADO	Case Number: 2013CV31385 Div.: 5B
<i>Attorneys for Defendant-Intervenors</i> Names: Elizabeth Kutch (Student Attorney) Timothy O'Leary (Student Attorney) Gina Tincher (Student Attorney) Kevin J. Lynch (Professor and Supervising Attorney; CO Bar No. 39873) Address: Environmental Law Clinic University of Denver Sturm College of Law 2255 E. Evans Ave, Suite 335 Denver, CO 80218 Phone: (303) 871-7870 E-mail: elc@law.du.edu	AFFIDAVIT OF DOLORES L. WILLIAMS IN SUPPORT OF MOTION TO INTERVENE AS A DEFENDANT

1. My name is Dolores L. Williams. I am of legal age and competent to give this affidavit. The facts and opinions set forth in this declaration are based on my personal knowledge, education and experience. If called as a witness in these proceedings, I could and would testify competently to these facts and opinions.

2. I currently reside at 415 Mason Court 7A, Fort Collins, CO 80524. I have lived in Fort Collins since 1962.

3. I have been a member of the Sierra Club for the last several years. Additionally, I am a member of Citizens for a Healthy Fort Collins.

4. I actively participated in the movement to get the Fracking Moratorium passed in Fort Collins. I spent many hours of my own time collecting signatures to get Ballot Measure 2A on the November 2013 ballot.

5. In addition to my time and effort, I contributed my financial resources to Citizens for a Healthy Fort Collins.

6. I not only supported the Fracking Moratorium via my volunteer work, but in addition, I voted in support of Ballot Measure 2A.

7. I support the Fracking Moratorium because I believe that the Fort Collins charter and the Home Rule Act give citizens the power to exercise their right to protect their health and safety.

8. If the Fracking Moratorium is overturned, I am concerned that I will be exposed to pollution in the air, land, and water as a result of fracking. I am afraid that exposure to hazardous methane, ozone, and cancerous chemicals will have a detrimental effect on my health.

9. My family also reside in Fort Collins, I am afraid for the continued health of my two grown sons, and three grandchildren.

10. I am also concerned about the chemicals that stay underground, those that contaminate our soil, and those that can end up in our wells because of this process.

11. I currently enjoy gardening, snowshoeing, biking, hiking, and walking outside in Fort Collins. If the moratorium is overturned, I will have to consider scaling back on my outdoor activities out of fear for my health.

12. I believe that residing near fracking sites can lead to cancer and nerve damage.

13. I am aware that the City Council voted 5-4 to not support the Fracking Moratorium. If the Council did not support the measure before it was voted on, I do not believe they will support it now that it must be defended in court. I believe that members of our City Council are closely aligned with the oil and gas industry.

14. If the Fracking Moratorium is overturned, I will be forced to move from Fort Collins to an area where fracking is not occurring.

15. I am concerned that I might not be able to sell my house if the moratorium is overturned because my property would lose value. I am aware of situations in other states where landowners have had to abandon their homes. I believe if the moratorium is overturned, fewer people will move to Fort Collins. This will also affect my ability to sell my home.

16. In addition to my primary residence, I own several other homes in Fort Collins. I am afraid that if the moratorium is overturned, I will be unable to find renters for these homes.

Dolores L. Williams

2-11-14

Dolores L. Williams

Date

SUBSCRIBED AND SWORN before me on this 11th day of February, 2014,

16. In addition to my primary residence, I own several other homes in Fort Collins. I am afraid that if the moratorium is overturned, I will be unable to find renters for these homes.
by Dolores Lambrecht Williams

Chelsea M. Creekmore

Notary Public

CHELSEA M. CREEKMORE
NOTARY PUBLIC
STATE OF COLORADO
NOTARY ID 20134031574
MY COMMISSION EXPIRES 06/12/2017

SUBSCRIBED AND SWORN before me on this _____ day of _____, 2014,
My Commission Expires: 10/12/17

Notary Public

SUBSCRIBED AND SWORN before me on this _____ day of _____, 2014,
My Commission Expires: _____

Notary Public

SUBSCRIBED AND SWORN before me on this _____ day of _____, 2014,
My Commission Expires: _____