

DISTRICT COURT, LARIMER COUNTY, COLORADO Address: 201 La Porte Avenue, Suite 100 Fort Collins, Colorado 80521 Phone: 970.494.3500	▲ COURT USE ONLY ▲
PLAINTIFF: COLORADO OIL & GAS ASSOCIATION v. DEFENDANT: CITY OF FORT COLLINS, COLORADO	
<i>Attorneys for Defendant-Intervenors</i> Names: Elizabeth Kutch (Student Attorney) Timothy O'Leary (Student Attorney) Gina Tincher (Student Attorney) Kevin Lynch (Professor and Supervising Attorney; CO Bar No. 39873) Address: Environmental Law Clinic University of Denver Sturm College of Law 2255 E. Evans Ave Denver, CO 80218 Phone: 303.871.7870 Fax: 303.871.6847 E-mail: elc@law.du.edu	
AFFIDAVIT OF RON HOLLEMAN IN SUPPORT OF MOTION TO INTERVENE AS A DEFENDANT	

1. My name is Dr. Ronnie Holleman. 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 am a resident of Fort Collins, Colorado. I currently reside at 2215 Sunbury Lane, Fort Collins, Colorado 80524. I have been a resident of Fort Collins since October 2012.

3. My home is located .5 miles from proposed fracking sites. Specifically, my home is located next to the Undeveloped Area ("UDA") of Fort Collins, which is the location of a proposed exploratory well.

4. I am a member of, and volunteer for Citizens for a Healthy Fort Collins. I have been a member of this organization since 2013.
5. I actively participated in the passage of the Fracking Moratorium. In fact, I served on the core committee for Citizens for Healthy Fort Collins.
6. I spent countless hours of my personal time circulating the petition to get the measure on the November 2013 ballot. In addition, I contributed financially to Citizens for a Healthy Fort Collins.
7. Not only did I spend my time and money in support of Ballot Measure 2A, I voted in favor of the fracking moratorium as well.
8. I devoted my time, energy, and financial resources to this cause because I strongly believe that hydraulic fracturing is an unsafe industrial process that has no place near communities.
9. If the Fracking Moratorium is overturned, I am afraid of the affects to the air quality, water quality, property values, and the health of the people in my neighborhood.
10. I believe that fracking can cause earthquakes as well as methane and benzene contamination of the water and soil. Additionally, an industrial process such as hydraulic fracturing releases other contaminants into our air on a daily basis.
11. I am afraid that if the Fracking Moratorium is overturned, my property values will decline.
12. I believe that the Fort Collins City Council will not vigorously defend the Fracking Moratorium. This belief is based on the fact that 4 of the 7 City Council members voted to adopt a resolution urging the citizens of Fort Collins to vote against the moratorium.

Ron Holleman

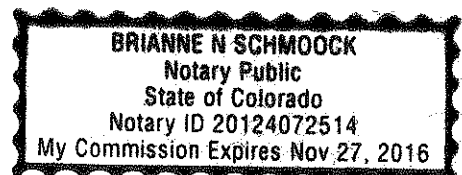
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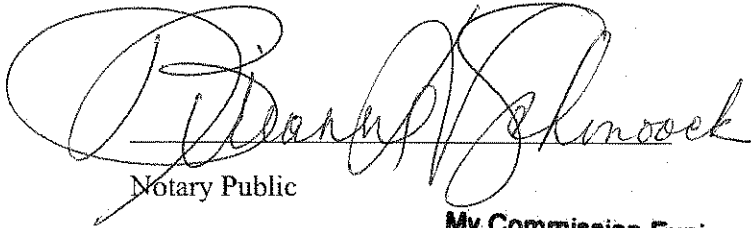
Ron Holleman

Date

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

by Ron Holleman




Notary Public

My Commission Expires: **November 27, 2016**