



To: SHER Task Force

From: Western Slope Local Elected Officials

Re: Statewide Hydrocarbon Emissions Reduction Process, 2019 New Proposals

Date: Feb. 11, 2019

To the SHER Task Force:

As elected officials representing Colorado residents in counties and local communities across the western slope, we write in support of the efforts underway by the Statewide Hydrocarbon Emissions Reduction Task Force and to encourage the Task Force to recommend that the Air Quality Control Commission (AQCC) adopt a strong regulatory plan that addresses ozone and methane emissions statewide. To that end, we urge the task force to consider proposals currently on the table as part of the SHER process to control emissions statewide and protect communities.

Colorado has been at the forefront of adopting technological and policy innovations that protect our air and reduce natural gas waste from the oil and gas sector. Colorado's 2014 methane rule became a national model for addressing source point pollution and combating climate change that other states and the federal government followed. In 2017, Colorado took steps to further reduce pollution in the ozone nonattainment area that encompasses nine counties along the Front Range.

While Colorado has made progress in reducing emissions, there is more work ahead. Since the initial adoption of Leak Detection and Repair requirements in 2014, the number of reported leaks has continued to decline steadily. Operators reported roughly 50 percent fewer leaks in 2017 than in 2014. However, the Denver Metropolitan region has still failed to meet federal ozone standards and will soon be designated by the EPA for serious ozone nonattainment.

Air pollution challenges are not limited to the Front Range, where enhanced leak detection and repair and other amended rules associated with Regulation 7 are currently in effect. Some active drilling sites and nearby residential areas and communities on the Western Slope are nearing the current standard and sometimes rise above 65 parts per billion for ozone. The large San Juan Basin methane plume in the Four Corners region demonstrates how a small percentage of emitters can significantly impact air quality. In 2018, the American Lung Association State of the Air Report also gave multiple Western Slope counties low grades (C or lower) for ozone.

Colorado can and should strengthen common-sense rules that cut ozone and methane emissions and reduce natural gas waste across the state. Below are the principles and recommendations that we ask the SHER Task Force to adopt in its recommendations to the AQCC. These principles are

**Western Leaders Network**

1309 East 3rd Avenue • Suite 22 • Post Office Box 4433 • Durango, Colorado 81302

970-317-4264 • [westernleaders.org](http://westernleaders.org)

included in several of the existing proposals from Boulder County and numerous citizen groups that are currently under consideration by the SHER Task Force.

1. **Statewide Application:** First and foremost, the AQCC should apply all of the 2017 and future amendments to Regulation 7 throughout the state. It is critical that industry use the latest technologies and methods to protect air quality in all areas they are drilling. Oil and gas companies already have to comply with the 2017 amendments in nine Front Range counties, proving those rules are economically feasible and achievable.

Residents in southern, western and eastern Colorado deserve the same air quality protections as residents living on the Front Range. State health regulations should be applied uniformly based on the principal of equality for both urban and rural areas. Air quality experts have also found that oil and gas development on the Western Slope can contribute to higher ozone levels on the Front Range.

We should not wait for air pollution on the Western Slope to worsen to the same levels as the Front Range before taking action. We can and should protect air quality and public health by adopting uniformly applied regulations now that address air quality issues directly tied to oil and gas operations.

2. **Protect residential areas:** Require pollution controls on both large and small pollution sources and increased inspections and repairs of oil and gas facilities that are within a quarter mile of homes, schools, or outdoor activity areas.

Natural gas and oil drilling has moved closer to residential communities across the state. It is critical that industry use the latest technologies and methods to protect air quality and reduce greenhouse gas emissions when they are drilling closer to homes, schools, and outdoor activity areas and in rural areas across the state. All Colorado residents should have the peace of mind that comes with strong regulations to protect air quality near their homes when oil and gas operations are located nearby.

3. **Tighten controls** to combat climate change and help ensure air quality compliance with the Clean Air Act on the Front Range where the problem already exists and elsewhere in the state where ozone levels are approaching non-attainment levels.

We all deserve to breathe clean air in Colorado. Given that additional steps will be needed to meet air quality standards, we recommend that the AQCC take further action to reduce ozone in the Front Range and avoid future ozone issues statewide. This includes but is not limited to stronger requirements for compressor stations, transmission facilities, and equipment generally such as pneumatic devices.

4. **Use regulatory rather than voluntary tools to meet these goals.** While there are energy companies in Colorado who do their best to protect the environment, this is not true of all operators. It is critical that any new rules be mandatory with clear reporting requirements to ensure compliance and protect our air quality.

Our air quality challenges are only going to become more complicated as oil and natural gas drilling continues moving closer to communities across the state. Additionally, as Colorado has

moved forward in addressing air pollution issues with energy development, the federal government has stepped back. The U.S. Bureau of Land Management recently rescinded their BLM methane waste rule despite strong support across the West, and the U.S. EPA has proposed gutting Leak Detection and Repair requirements for new development.

It is imperative that the state of Colorado continue its role as a leader in this area. We urge the SHER Task Force to adopt these recommendations and devise effective uniform standards that protect air quality, improve public health, and reduce methane waste across our entire state.

Sincerely,

Adam Frisch  
City Council Member  
Aspen

Gwen Lachelt  
County Commissioner  
La Plata County

Dan Richardson  
Mayor  
Carbondale

Rachel Landis  
La Plata County Electric Association Board  
Director  
La Plata County

Dean Brookie  
City Council Member  
Durango

Guinn Unger  
La Plata County Electric Association Board  
Director  
La Plata County

Dick White  
City Council Member  
Durango

Steve Child  
County Commissioner  
Pitkin County

Melissa Youssef  
City Council Member  
Durango

Patti Clapper  
County Commissioner  
Pitkin County

Kathy Chandler-Henry  
County Commissioner  
Eagle County

Kelly McNicholas Kury  
County Commissioner  
Pitkin County

Jeanne McQueeney  
County Commissioner  
Eagle County

George Newman  
County Commissioner  
Pitkin County

Bennett Boeschstein  
Mayor Pro Tem  
Grand Junction

Greg Poschman  
County Commissioner  
Pitkin County

John Messner  
County Commissioner  
Gunnison County

Tim Corrigan  
County Commissioner  
Routt County

Beth Melton  
County Commissioner  
Routt County

Hilary Cooper  
County Commissioner  
San Miguel County

Kris Holstrum  
County Commissioner  
San Miguel County

Lance Waring  
County Commissioner  
San Miguel County

Jenny Russell  
Southwestern Water Conservation Board  
Director  
San Miguel County

Bob Sirkus  
Town Council Member  
Snowmass Village

Karn Stiegelmeier  
County Commissioner  
Summit County

Todd Brown  
Mayor Pro Tem  
Telluride

Kim Langmaid  
Town Council Member  
Vail