



To: Colorado Air Quality Control Commission, SHER Task Force

Re: Statewide Hydrocarbons Emission Reduction Process

Date: January xxx, 2018

To the Colorado Air Quality Control Commission and the SHER Task Force:

As elected officials representing Colorado residents in counties and communities across the state, we write in support of the efforts underway by the Statewide Hydrocarbon Emissions Reduction Task Force and to encourage the Air Quality Control Commission to adopt a strong plan that addresses ozone and methane emissions statewide.

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 rule became a national model that other states and the federal government followed. Then in 2017, Colorado took steps to further reduce pollution in the ozone nonattainment area that encompasses nine counties along the Front Range.

Unfortunately, as Colorado has moved forward, the federal government has stepped back. The U.S. Bureau of Land Management recently rescinded its methane waste rule despite strong support across the West, and the U.S. Environmental Protection Agency has proposed gutting Leak Detection and Repair requirements for new development. Now, more than ever, Colorado must continue its leadership.

While we have made progress in reducing emissions, there is more work ahead. Since the adoption of the 2014 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.

Also, air pollution challenges are not limited to the Front Range, where the leak detection and repair and other amended rules associated with Regulation 7 are currently in effect. Active drilling sites and nearby residential areas and communities on the Western Slope are nearing the current standard and rise above 65 parts per billion for ozone. 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 commonsense rules that cut methane and ozone emissions and reduce natural gas waste across the state. Below are the principles and recommendations that we ask the SHER Task Force and the AQCC to consider and adopt.

Western Leaders Network

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1. **Statewide Application:** First and foremost, the AQCC should apply all of the 2017 and future amendments to Regulation 7 throughout the state.

Residents in southern, western and eastern Colorado deserve the same protections as residents living on the Front Range. We should not create a second class of citizens in rural communities who do not receive the same level of air quality protections as those living in urban areas. 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.

Moreover, the Western Slope knows all too well the direct impacts that methane and climate pollution bring, such as longer, more intense wildfire seasons and increased drought. We should not wait for air pollution issues to get worse on the Western Slope before those issues are addressed.

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 and 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 Regulation 7** to help ensure air quality compliance with the Clean Air Act and Combat Climate Change.

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 quarterly leak detection and repair requirements at production and transmission facilities and stronger requirements for compressor stations, transmission facilities and equipment in general, such as pneumatic devices.

Our air quality challenges are only going to become more complicated as oil and natural gas drilling moves closer to communities across 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 different counties, proving those rules are economically feasible and achievable.

We urge the AQCC and 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,