



To: Air Quality Control Commission  
From: Colorado Local Elected Officials  
Re: Rulemakings  
Date: Nov 22, 2021

Dear Air Quality Control Commissioners and Staff,

As elected officials from across Colorado, we write in support of the work being done by the Air Quality Control Commission in response to the Air Pollution Control Division's proposal to reduce methane and VOC emissions from oil and gas facilities. This is important work that requires strong regulatory action to help Colorado meet its climate pollution reduction goals and do its part to address the climate crisis. The rulemaking efforts underway are critical to protect the air we breathe and the environment in which we live and recreate. For Disproportionately Impacted Communities, your current rulemaking is vitally important. Every Coloradan deserves to breathe clean air, drink clean water, and live, work and recreate in a safe, healthy environment.

This December, the Air Quality Control Commission will consider comprehensive rules to specifically address greenhouse gas emissions in the oil and gas sector. It is vital that the AQCC strengthens standards to directly regulate methane emissions and safeguard our climate future. This is the best way to ensure reductions now as the APCD works to establish a more reliable inventory and ensure actions are taken now that result in the necessary emissions reductions of methane, VOCs and other noxious chemicals that threaten public health, the environment and our climate. Direct regulation of oil and gas emissions represents the strongest path toward meeting the 60 percent reduction in greenhouse gases by 2030, as required by HB1266.

We therefore encourage the AQCC to adopt four strategies to reduce emissions:

- Significantly increase leak detection and repair requirements for both new and existing sources of emissions;
- Utilize both advanced screening such as aerial monitoring or drones and ground-based monitoring technologies such as optical gas imaging cameras to detect methane emissions monthly. This is more effective than solely utilizing ground detection and a more efficient use of time and money if deployed correctly;

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- Expand the use of non-emitting pneumatic devices for existing operations once the initial phase-in is complete; and
- Prohibit venting during maintenance activities.

The performance-based methane intensity standard under consideration faces severe challenges to meet Colorado’s climate pollution targets for the oil and gas sector. It relies on industry participation from hundreds of operators of varying size and capacity across the state. To date, no regulatory agency has been able to fully address the challenges of verification of emissions reported by operators. Direct regulation as discussed above can be implemented without having to rely on flawed inventories and unproven verification methods. An accurate inventory is critical for success in achieving significant greenhouse gas reductions. Unfortunately, Colorado’s current system of measuring emissions inventories fails to accurately account for leaks, especially large emission events known as “super-emitters.”

Communities across Colorado are increasingly facing extreme weather and environmental events as a result of climate change. This summer, Denver had the [worst air quality in the world](#) thanks to both the existing ozone problem and wildfires across the West. Western Colorado is gripped by a 20-year drought, and record-sized wildfires have impacted communities on both sides of the continental divide. This is having real world impacts on agriculture- and recreation-based economies across the state, affecting hundreds of thousands of households. The direct public health impacts from ozone, formed in significant part by VOCs released from oil and gas facilities, reaches across the state as well. In 2021, the Northern Front Range set a new record with [74 ozone action days](#) where the air outside was unsafe to breathe, and Coloradans were advised to stay indoors. And multiple Western Slope counties received low grades for ozone pollution in 2021 in the [American Lung Association State of the Air Report](#). Garfield County, for the first time ever, received an “F” grade for high ozone pollution days, while Gunnison and La Plata counties both received a “D.” We must do better to protect the health of our communities.

As elected officials, we applaud the work done so far by the AQCC and APCD and urge you to remain proactive. Direct regulation of this large and environmentally impactful industry is an important step in helping Colorado achieve its climate goals within the timeframe set forth in state law. It will have direct positive impacts on our constituents and their health, and it ensures the state is doing its part in addressing the climate crisis.

Sincerely,

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