

From: "Nicolle McCown" <nicolle@club20.org>
Subject: Letter to Garfield County Commissioners

January 28, 2014

Garfield County Board of County Commissioners
108 8th Street
Glenwood Springs, Colorado 81601

Dear Commissioners,

CLUB 20 recognizes and supports the leadership role Garfield County has undertaken in an effort to ensure that state air quality regulations applied to oil and gas operations are based on objective science, and reflect the realities of unique local and regional conditions. CLUB 20 members live in areas with clean air and support reasonable regulations that ensure the best air quality throughout the state.

Garfield County has commissioned a comprehensive air quality study being conducted by Colorado State University in an effort to measure and monitor emissions from natural gas operations in the region. Surely this effort will provide significant insights regarding impacts related to natural gas development throughout the production cycle. Garfield County has a long history of researching air quality impacts and leading the way in maintaining a high level of air quality by implementing an extensive air monitoring program as well as studying and controlling emissions from natural gas development.

CLUB 20 members recognize the importance of robust state regulations with regard to air quality and the impact of shale gas development. However, a one-size-fits-all approach is often inappropriate when it comes to the diverse geographies throughout the state and particularly the Western Slope.

Emissions from dry gas production characteristic of Western Colorado gas production are different than those from production rich in liquids like occurs in the Eastern part of Colorado. Factors like geography, terrain, weather and population can have an impact on emissions across regions; regulations should take these factors into consideration based on regional studies. We often find that "one size fits all" regulatory strategies do not make sense where significantly different conditions exist.

Colorado regulatory bodies would serve Western Colorado communities better by reviewing the efforts Garfield County has implemented and to develop regulations based on the current science related to the region. Development of regionally appropriate regulatory oversight will support the goal of developing Colorado's resources in an environmentally safe manner while protecting the economies of the West Slope. Garfield County has led the way in balancing competing interests and we encourage the State of Colorado to follow that lead in the development of new air quality standards related to oil and gas production throughout the state.

Sincerely,

Bonnie Petersen<signed>
Executive Director
Club 20



December 16, 2013

Air Pollution Control Division
Colorado Department of Health & Environment
Attn: Will Allison, Director
4300 Cherry Creek Drive South
Denver, CO 80246-1530
william.allison@state.co.us

Department of Regulatory Agencies
Attn: Barbara J. Kelley, Executive Director
1560 Broadway, Suite 110
Denver, CO 80202
barbara.kelley@state.co.us
DORA_EDO@state.co.us

Re: Grand Junction Area Chamber of Commerce Request for Cost-Benefit Analysis and Regulatory Analysis under the Colorado Administrative Procedure Act in the Matter of Proposed Revisions to Colorado Air Quality Control Commission Regulation Number 3, Parts A, B, and C; Regulation Number 6, Part A; and Regulation Number 7

Dear Mr. Allison and Ms. Kelley;

On December 10, 2013, the Colorado Air Quality Control Commission (“**Commission**”) published in the Colorado Register a Notice of Public Rulemaking Hearing Before the Commission regarding proposed revisions to Regulation Number 3, Parts A, B, and C; Regulation Number 6, Part A; and Regulation Number 7 (the “**Proposed Rule**”). In support of the Proposed Rule, the Air Pollution Control Division also issued an Initial Economic Impact Analysis (“**Initial EIA**”).

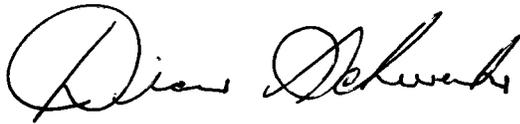
Under two separate provisions of the Colorado Administrative Procedure Act (“**APA**”), any person may request additional economic and regulatory impact analyses. Under Colorado Revised Statutes § 24-4-103(2.5)(a) “any person may, within five days after publication of the notice of proposed rule-making in the Colorado Register, request that the department of regulatory agencies [(“**DORA**”)] require the agency submitting the proposed rule or amendment to prepare a cost-benefit analysis.” Additionally, under Colorado Revised Statutes § 24-4-103(4.5) “upon [the] request of any person, at least fifteen days prior to the hearing, the [Division] shall issue a regulatory analysis of a proposed rule.” Each analysis must contain specific and detailed information justifying adoption of the Proposed Rule. It is crucial that the Commission be provided with the type of information required in these analyses by the Colorado Legislature under the Colorado APA and well-recognized as fundamental to the rulemaking process. The cost-benefit analysis and a regulatory analysis are

highly relevant to the Commission's deliberations with respect to the Proposed Rule and will better inform the rulemaking proceedings, the Commission's decision, and the public.

Here, the cost-benefit analysis and regulatory analysis are especially important because the Proposed Rule is extensive, complicated, and costly, and would impact the exploration and production of oil and gas in Colorado, a significant industry to the economy of Colorado and Western Colorado. Specifically, these analyses are important to the Grand Junction Area and Mesa County because we have already seen a net loss of over 600 businesses from the County since 2008 and should these rules be shown to have a greater cost than the benefit to the public we could very likely lose even more. For the reasons discussed above, the Grand Junction Area Chamber respectfully requests that DORA require the Division to perform a cost-benefit analysis under Colorado Revised Statutes §24-4-103(2.5) and that the Division conduct a separate regulatory impact analysis pursuant to Colorado Revised Statutes § 24-4-103(4.5).

Please do not hesitate to contact me if you have any questions or concerns regarding this request.

Sincerely,

A handwritten signature in black ink, appearing to read "Diane Schwenke". The signature is written in a cursive, flowing style.

Diane Schwenke
President/CEO
Grand Junction Area Chamber of Commerce

cc: Theresa L. Martin, Air Quality Control Commission
GJ Chamber Board



COMMISSIONERS

January 24, 2013

Garfield County Commissioners,

I wanted to take a moment and express Moffat County's appreciation for the staff time you have allowed Kirby Winn to dedicate to the current Air Quality Commission Hearings on behalf of several western slope counties. Kirby has done an outstanding job keeping us informed and representing us during the ongoing process. Garfield County leads the nation in sponsoring a world class air study as well your experience in balancing community benefits of oil and gas extraction with protection of the environment. Garfield County is in a unique position to represent us in air quality issues affecting the entire western slope, including Moffat County, and I wish express our appreciation for your efforts.

Sincerely,

Tom Mathers, Chairman
Moffat County Commissioner



RIO BLANCO COUNTY
BOARD OF COUNTY COMMISSIONERS
COUNTY ADMIN BUILDING, 200 MAIN
P.O. BOX I
MEEKER, COLORADO 81641
970-878-9430

January 28, 2014

Garfield County Board of County Commissioners
108 8th Street
Glenwood Springs, Colorado 81601

Dear Commissioners,

On behalf of our constituents, the Board of County Commissioners of Rio Blanco County would like to thank you for your continued leadership in the area of air quality, particularly in helping to ensure that air quality regulations for oil and gas operations are based on objective science, and reflect the realities of unique local and regional conditions.

Everyone in Colorado wants clean, healthy air, and are fully in support of reasonable and effective regulations for a high standard of air quality for our state. Garfield County has led the region in this respect. For over 2 decades, Garfield County has been committed to studying and controlling emissions from natural gas development activity. Since then, Garfield County has commissioned a major, comprehensive, and rigorous study, conducted by Colorado State University, to characterize and monitor emissions from natural gas operations. In addition, Garfield County has implemented one of the most extensive air monitoring programs seen in any rural county in the nation.

We agree with Garfield County that while robust state regulations are necessary, a one-size-fits-all approach is inappropriate and ineffective. The emissions generated from the dry gas production characteristic of western Colorado are different than those generated by the oil and liquids rich production that is occurring on the Front Range. Various other factors, ranging from population density, to geography and terrain, to the local weather, affect emission levels from one basin to another.

We would encourage the State of Colorado, as they consider a regulatory system to control oil and gas related emissions, to look to what you have done in Garfield County, and to base their recommendations on sound science, and regionally appropriate solutions. Garfield County has done an admirable job in representing the interests of all of northwest Colorado in this process, and the Rio Blanco County Board of Commissioners wishes to express our appreciation and continued support for your ongoing leadership on this issue.

Sincerely,

Board of County Commissioners, Rio Blanco County

Jon D. Hill, Chairman

Jeff Eskelson

Shawn Bolton



January 28, 2014

Garfield County Board of County Commissioners
108 8th Street
Glenwood Springs, Colorado 81601

Dear Commissioners,

On behalf of our member governments, the Associated Governments of Northwest Colorado would like to thank you for your continued national, state, and regional leadership in the area of air quality, and particularly in regards to your leading role in helping to ensure that state air quality regulations applied to oil and gas operations are based on objective science, and reflect the realities of unique local and regional conditions.

All of us in northwest Colorado want clean, healthy air, and as such are fully in support of reasonable and effective regulations to help ensure a high standard of air quality for our state. Garfield County has led the region in this respect, and we wish to recognize that commitment. For over 2 decades, Garfield County has been committed to studying and controlling emissions from natural gas development activity – long before the issue was on anybody’s radar. Since then, Garfield County has commissioned a major, comprehensive, and rigorous study, conducted by Colorado State University, to characterize and monitor emissions from natural gas operations. In addition, Garfield County has implemented one of the most extensive air monitoring programs seen in any rural county in the nation, and has been more than willing to share data with fellow counties, municipalities, citizens, and the state.

Thanks in large part to the increased production and use of natural gas, America’s greenhouse gas emissions have dramatically reduced in recent years. The part that northwest Colorado, and in particular Garfield County, has played in bringing about that shale gas revolution and improving overall air quality, is difficult to overstate and is something that the government and citizens of Garfield County should be justifiably proud of.

We agree with Garfield County that while robust state regulations are necessary, a one-size-fits-all approach is inappropriate and ineffective. The emissions generated from the dry gas production characteristic of western Colorado are different than those generated by the oil and liquids rich production that is occurring on the Front Range. Various other factors, ranging from population density, to geography and terrain, to the local weather, affect emission levels from

one basin to another. It is simply unfeasible to attempt to apply the same regulatory program to every region within the state.

We would encourage the State of Colorado, as they consider a regulatory system to control oil and gas related emissions, to look to what you have done in Garfield County, and to base their recommendations on sound science, and regionally appropriate solutions. Garfield County has done an admirable job in representing the interests of all of northwest Colorado in this process, and the Associated Governments of Northwest Colorado wish to express our appreciation and continued support for your ongoing leadership on this issue.

Sincerely,

The Hon. Scott McInnis
Executive Director, AGNC