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PASS THE STEAK: PERSPECTIVES ON
COLORADO'S RECENT OIL & GAS
STAKEHOLDER PROCESSES

WILL MARSHALL

- Storage Tank Guidelines
- SHER Task Force
- Pneumatic Controller Task Force
- Expectations for the Next Year
- Unknowns

- Guidelines stem from several “general duty” provisions of Colorado’s AQCC Regulation 7
- Goals of the Workgroup and Guidelines:
 - Improve VCS performance
 - Address ‘over-pressurization’
 - Create regulatory transparency for ‘Design, Operation and Maintenance’ of tank batteries and VCS

- Over 50 pages of technical guidance and recommendations in two areas
 - Design: how can operators adequately design tank batteries?
 - Operation and Maintenance (O&M): ongoing measures to reduce facility emissions

- Implications—what do the Guidelines mean and where are they going?
- Guidelines are a *voluntary* compliance tool.
- Guidelines are NOT rules or regulations, nor do they modify, limit or expand existing regulatory requirements.
- Implementation is intended to be flexible from operator to operator.

- COC and CD compliance—a stand in for following the Guidelines?
- How will the Division treat the Guidelines during an enforcement action?
- Will the Guidelines (or something similar) move into other jurisdictions or be adopted by the EPA?



SHER TASK FORCE

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- Emission reductions are not necessarily emission controls
- Accomplishments
 - Understanding a wide variety of topics
 - Innovative ideas
 - Collaboration that drives towards emission reductions

- Monthly stakeholder-wide meetings
- Hundreds of hours of detailed, important evaluation and consideration
- SHER's pneumatic strategies are expected to be informed by the PCTF



PNEUMATIC CONTROLLER TASK FORCE

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- Field Data Collection Effort
 - 179 facilities
 - 3,838 controllers
 - Goal was to evaluate the extent of improperly operating PC's
- Evaluation of the data and implications is ongoing



PNEUMATIC CONTROLLER TASK FORCE

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- Expect continued discussion and understanding of PC operation and definitions
- Additional data from the Find and Fix program data results
- Additional evaluation of cost effectiveness and repair techniques

TASK FORCES NEXT STEPS

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- Over the next year or so, SHER and PCTF will finalize recommendations and reports for the AQCC
- Both task forces and stakeholders will present findings at the AQCC
- SHER in early 2020
- PCTF in mid 2020

EXPECTATIONS

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- Voluntary Programs
- More task forces?
- Regulatory Requirements
- Potential Rulemaking



UNKNOWNNS-SB 181

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(A) A REQUIREMENT THAT LEAK DETECTION AND REPAIR INSPECTIONS OCCUR AT ALL WELL PRODUCTION FACILITIES ON, AT A MINIMUM, A SEMIANNUAL BASIS OR THAT AN ALTERNATIVE APPROVED INSTRUMENT MONITORING METHOD IS IN PLACE PURSUANT TO EXISTING RULES;

(D) A REQUIREMENT TO REDUCE EMISSIONS FROM PNEUMATIC DEVICES. THE COMMISSION SHALL CONSIDER REQUIRING OIL AND GAS OPERATORS, UNDER APPROPRIATE CIRCUMSTANCES, TO USE PNEUMATIC DEVICES THAT DO NOT VENT NATURAL GAS.

UNKNOWN-REGULATORY ENVIRONMENT

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COLORADO
Governor Jared Polis

March 26, 2019

Doug Benevento
Regional Administrator
USEPA Region VIII
1595 Wynkoop Street
Denver, CO 80202-1129

Re: *Withdrawal of Colorado's Request to Extend the 2008 Ozone National Ambient Air Quality Standard Attainment Date for the Denver Metropolitan/North Front Range Nonattainment Area*

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QUESTIONS?
