

Colorado Oil & Gas Association

1660 Lincoln Street, Suite 2710
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James B. Martin
Executive Director
Colorado Department of Public Health and Environment
4300 Cherry Creek Drive South
Denver, Colorado 80246-1530

January 21, 2008

Dear Jim:

COGA and its member companies support a well-funded, effective regulatory program to ensure the protection and improvement of air quality in Colorado. COGA has a record of proactive, positive involvement with the Air Quality Control Commission, and the Air Pollution Control Division (APCD) of the Colorado Department of Public Health and Environment. COGA is also a partnering organization with EPA's Natural Gas STAR program, whereby industry undertakes voluntary measures to reduce emissions of methane – a potent greenhouse gas.

With respect to air quality concerns related to oil and gas activities in Colorado, COGA and its members have and are conducting the following activities:

- Conducted a statewide sampling and analysis project that resulted in adoption of emission factors for condensate tanks.
- Worked with the APCD to establish reporting requirements for oil and gas facilities, utilizing the approved emission factors.
- Supported the Early Action Compact to defer designation of the Denver region as nonattainment for ozone pollution.
- Participated in a consensus rulemaking that required installation of emission controls on oil and gas facilities in the Wattenberg Field north of Denver.
- Agreed in a follow-up rulemaking to increase the level of emission reductions in the Wattenberg Field, and to extend emission control requirements statewide.
- Working with the APCD to develop an efficient permitting process to address the thousands of new oil and gas facilities installed annually.
- Working with the Regional Air Quality Council (RAQC) to develop a new ozone control element for the State Implementation Plan (SIP) in response to EPA's designation of the Denver region as nonattainment. This includes funding and data contribution to a regional oil and gas emission inventory under the aegis of the Western Regional Air Partnership that will be utilized by the RAQC and APCD in its SIP modeling effort.

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It is important from COGA's perspective that the APCD be adequately funded to administer its programs related to oil and gas, and especially that it have sufficient permitting personnel to handle the volume of permit applications in a timely manner. COGA is supportive of the Department's efforts to increase fees to support the Air Pollution Control Division.

Sincerely,

A handwritten signature in black ink, appearing to read "Meg Collins". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Meg Collins
President
Colorado Oil & Gas Association

cc: Paul Tourangeau, Director Air Pollution Control Division
Martha Rudolph, Director, Environmental Programs
Adam Eichberg, Director of Policy, Planning & External Affairs