

**BEFORE THE OIL AND GAS CONSERVATION COMMISSION
OF THE STATE OF COLORADO**

IN THE MATTER OF CHANGES TO THE)	CAUSE NO. 1R
RULES AND REGULATIONS OF THE OIL &)	
GAS CONSERVATION COMMISSION OF)	DOCKET NO. 191200754
THE STATE OF COLORADO)	
)	TYPE: RULEMAKING

RESPONSE STATEMENT OF THE ALLIED LOCAL GOVERNMENT COALITION

Boulder County, the City of Lafayette, the City and County of Broomfield, the Town of Erie and the City of Longmont, participating as the Allied Local Government Coalition (the “ALGC”), by and through each party’s respective undersigned counsel, appreciate the opportunity to submit this Response Statement to the Colorado Oil and Gas Conservation Commission (“COGCC” or “Commission”) Staff’s Wellbore Integrity Rulemaking.

I. Statement of Party Position

The ALGC commends the efforts of COGCC staff to update its wellbore integrity rules to ensure they protect public health, safety, welfare, the environment, and wildlife.

In our Prehearing Statement we requested copies of all notices and reports submitted to the COGCC, as well as access to certain records. In response COGCC “is working to develop an automated form through which an LGD can select which submittals it wants to receive. The Commission anticipates this automated solution will be finalized in late 2020.”¹ The ALGC supports this proposed pathway which would facilitate transparency and information-sharing

¹ COGCC, Draft Statement of Basis, Specific Statutory Authority, and Purpose, New Rules and Amendments to Current Rules of the Colorado Oil and Gas Conservation Commission, 2 CCR 404-1 (Mar. 3, 2020).

among local and state oil and gas regulators and the public. The proposal squarely addresses our request for access to notices and reports provided to the COGCC.

We are in discussions with COGCC staff regarding how best to provide local governments access to records required to be maintained by COGCC rules. The issue of access to records, like that of notice and reporting, is not limited to the wellbore integrity rules. Recordkeeping requirements appear throughout the COGCC rule series, including many of the rules Staff has indicated are subject to revision this spring during the “Mission Change” rulemaking. Since our interest for access to records involves many of the rules subject to the “Mission Change” rulemaking, and in order to provide more time for us to work with Staff to identify a mechanism to allow local government access to records, we are tabling this request for now and plan to raise it again during the “Mission Change” rulemaking.

II. Witness List

The City and County of Broomfield plans to call Guyleen Castriotta, Mayor Pro Tem, as a witness. Mayor Pro Tem Castriotta will testify in support of the ALGC request for copies of notices and reports and in support of the Staff automated solution that would allow local governments to opt in to receive copies of operator’s submissions to the COGCC.

Thank you for your consideration of this Response Statement.

DATED this 10th day of March 2020.

Respectfully submitted,

CITY AND COUNTY OF BROOMFIELD, COLORADO

Elizabeth Paranhos
deLone Law, Inc
1555 Jennine Place
Boulder, Colorado 80304

elizabethparanhos@delonelaw.com

By: 

CITY OF LAFAYETTE, COLORADO

Elizabeth Paranhos
deLone Law, Inc
1555 Jennine Place
Boulder, Colorado 80304
elizabethparanhos@delonelaw.com

By: s/ _____

BOULDER COUNTY, COLORADO

Kimberly Sanchez
Chief Planner and LGD
P. O. Box 471
Boulder, CO 80306
ksanchez@bouldercounty.org

By: s/ _____

TOWN OF ERIE

Barbara Green
Sullivan Green Seavy
3223 Arapahoe Avenue Suite 300
Boulder, CO 80303
barbara@sullivangreenseavy.com

By: s/ _____

CITY OF LONGMONT

Eugene Mei
350 Kimbark St.
Longmont, CO, 80501
Eugene.Mei@longmontcolorado.gov

By: s/ _____

