



LOGIC Summary – 900 Series Rulemaking Day 1 – 10/26/20

Today saw the Mission Change rulemaking start back up again after a weeklong break. The break was the result of the Commission pushing back to 1200 Series. The topic for this week is the 900 Series rules. The main issues in the 900 Series are:

- Venting and flaring
- Pits
- Waste management
- Cumulative impacts

As today was the first day of the 900 Series Rulemaking Hearings, the day began with a presentation from the Commission staff on their proposed rules. Venting and flaring are some of the lowest hanging fruit when it comes to reduce greenhouse gas emissions from the oil and gas industry. Flaring is the process of burning off natural gas that comes up with oil and produced water to dispose of it. Venting is the process of simply letting that natural gas flow out into the atmosphere. Since natural gas is largely made up of methane, which is more than 80-times more potent a greenhouse gas than carbon dioxide, this venting process is extremely problematic.

During their presentation today, staff stated that these rules would result in the prohibition of “routine” venting and flaring within a year of their effective date. “Routine” in this case basically means all non-emergency venting and flaring. Operators will still be allowed to vent or flare gas if necessary to protect the health and safety of workers on the wellpad or facility.

The staff presentation was less promising when it comes to pits. Pits are largely falling out of fashion in Colorado, being replaced by tanks, but they are still in use today in many places. Pits pose a serious danger to the public health and wildlife, but staff continued to make numerous arguments why pits need to be allowed in certain circumstances. Finally, staff presented their proposed requirements for a cumulative impacts plan that each operator would submit to the COGCC.

Following the staff presentations, we heard from over 60 Coloradans during the public comment session. Comments asking the commission to prohibit routine venting and flaring, ban the use of pits, and to push for a stronger cumulative impacts assessment vesting outweighed any comments to the contrary. Elected officials from across the state spoke about the need to prohibit venting and flaring to reduce the impacts from climate change and air pollution. Impacted Coloradans spoke out against venting and flaring and told heartfelt stories about the impact climate change is having on them and their families.

Tomorrow will begin party presentations on the 900 Series rules.