PUBLIC COMMENT OF JIM RAMEY, DIRECTOR OF CITIZENS FOR A HEALTHY COMMUNITY BEFORE THE AIR QUALITY CONTROL COMMISSION, COLORADO DEPARTMENT OF PUBLIC HEALTH AND ENVIRONMENT REGARDING THE OIL & GAS RULEMAKING, PROPOSED REVISIONS TO REGULATION NUMBERS 3, 6 & 7

Colorado Air Quality Control Commission
Colorado Department of Public Health and Environment
4300 Cherry Creek Drive South, EDO-AQCC-A5
Denver, Colorado 80246

Submitted via electronic mail to: cdphe.aqcc-comments@state.co.us

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My name is Jim Ramey and I’m the Director of Citizens for a Healthy Community, a Delta County organization formed by a group of concerned residents in 2009 to protect our community from irresponsible oil and gas development. Citizens for a Healthy Community’s members include farmers, ranchers, small business owners, and other concerned citizens impacted by oil and gas development.

First, I’d like to thank everyone who has been involved with this effort because we desperately need these regulations. With over 51,000 active wells in the state, and tens of thousands more coming in the next few years, it has taken far too long for statewide air pollution rules for this industry to become a reality.

In the Delta County region, hundreds of new oil and gas wells have been proposed. Air pollution from this industry is such cause for concern that we’ve undertaken a baseline air sampling program to test for the chemical signature of these fossil fuels before large-scale drilling begins. After our year-long study is complete, we will make all of the data public. I hope that this illustrates for you just how important clean air is to residents in rural areas like ours.

Citizens for a Healthy Community supports the proposed rules. These rules are good for the climate, because they drastically reduce methane emissions. These rules are good for people, because they reduce harmful emissions of volatile organic compounds. And these rules are good for Colorado’s agricultural producers, including many of our members, because they will result in less ozone, which is harmful to food production.
While we support the proposed rules, we agree with the Local Community Groups that the rules should be strengthened. Specifically, the lower threshold of 2 tons per year should apply to both glycol dehydrators and tanks when these facilities are located within ¼-mile of homes. Both tanks and glycol dehydrators are known sources for benzene and other toxic and carcinogenic chemicals, so the lower threshold should apply to both. Further, wells should be inspected more frequently if they are close to homes or other community facilities, at least once per year; and major leaks should have to be fixed immediately, at least within 24 hours. Lastly, it should be mandatory for inspection reports to be publicly available and posted online to the AQCC website.

Air pollution from this industry doesn’t stop at county lines, and that’s why we need a strong, statewide standard. Rural residents of Colorado deserve to breathe clean air just like residents on the Front Range. Please, reject the call from some members of the industry to gut the new rules and subject rural residents to dirtier air. The industry’s attitude of “don’t increase regulations, just trust us,” cannot be tolerated any longer. Now is the time to do this right. Thank you for your time and consideration.

Respectfully submitted,

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