

DRAFT OIL & GAS RULES AUGUST 2020

Operational Related Rules

| Draft Rule/Requirement | Why | Other Jurisdictions |
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| Requirement to operate and maintain all equipment per manufacturer specifications and reasonable and customary maintenance practices. | Sets a reasonable standard and ensures proper equipment operation and maintenance; Could potentially decrease air contamination from some equipment | Adams (current rules) Aurora (proposed rules) |
| Steel berms and synthetic liners for secondary containment for large onsite storage tanks, instead of earthen berms, for all new facilities | Earthen berms can have holes bored by animals. They also deteriorate over time and lose height due to precipitation, thereby losing their capacity to sufficiently contain liquids | Larimer (current rules) Thornton (current rules) |
| Existing earthen berms must be maintained to have the minimum sufficient holding capacity (1.5 times the volume of the largest tank) | This allows earthen berms for existing facilities. Earthen berms wear down over time due to precipitation, thereby reducing their capacity to capture releases from tanks | Unique to AC |
| Secondary containment for all aboveground tanks. including temporary tanks, separators and small tanks holding liquid substances such as ethylene glycol or lubricants | Containers leak. Secondary containment for smaller containers can be large trays or small plastic child's swimming pool. | Aurora (proposed rules) Common industry practice |
| Secondary containment inspected weekly and within 48 hours of a precipitation event | Already in our existing MOU. Assures that leaks or capacity problems are detected early. | Larimer (current rules) Thornton (current rules) Adams is similar |
| New technologies required if new technologies for surface operations are technologically sound, economically practical and reasonably available to the operator | Could apply to safety innovations, leak prevention or health and safety | Aurora (proposed rules) Broomfield (proposed rules) |
| Untreated produced water will not be used for dust suppression | Produced water contains hydrocarbons and high dissolved solids, which can contaminate soil adjacent to roads; Vegetation cannot grow in high TDS-contaminated soil. | Adams (current rules) Aurora (proposed rules) Thornton (current rules) |