

DRAFT OIL & GAS RULES AUGUST 2020

Health and Safety Related Rules

Draft Rule	Why	Other Jurisdictions
Will Serve Letter from fire district with authority or a contract for emergency services	This requirement is part of our existing MOU and LDC	Elbert (MOU)
Emergency Action Plan before construction; includes current 24/7 contact info.	Allows upfront coordination with emergency responders Consistency with other Front Range jurisdictions. Encouraged by COGCC.	Greeley (current rules), Thornton (current rules), Boulder (proposed rules), Broomfield (proposed rules), Aurora (OP/Agreement & proposed rules) Larimer (current rules).
Tactical Response Plan before construction	Recommended by COGCC for consistency with other Front Range jurisdictions.	Greeley (current rules)
Establish Emergency Evacuation Routes	Pre-emergency planning to improve emergency response	Greeley (current rules)
Hazardous Materials Inventory	Provides emergency responders with critical information for an onsite response	Broomfield (proposed rules)
List of onsite chemicals	Provides emergency responders with critical information for an onsite response	Aurora (OP/Agreement & proposed rules); Larimer (current rules)
Inspections by fire district and County staff	Allows fire districts, OEM and County staff access to facilities for compliance evaluations	Adams (current rules; inspectors only); Broomfield: (OP/Agreement, inspectors only)
Signs at all well pads	Allows Emergency responder verification they arrived at the correct facility	Aurora (proposed rules)
Repair damage to infrastructure caused by Operator's emergencies	Relieves County of potential expenses	Broomfield OP/Agreement
Coordinated training with fire district and OEM	Each agency will be familiarized with the facility; Will make a potential response more efficient	Broomfield OP/Agreement
Certificates of Completion of FEMA NIMS training	Assures fire districts and OEM that operator's staff and consultants have the proper training to respond to well site emergencies	Adams Co. (similar current rules)
Follow fire codes and standards of local fire district (fire district enforcement)	Removes ambiguity regarding the appropriate codes and standards	Unique to AC

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Store water and/or foam near pads	To aid in firefighting	Adams (current rules) Aurora (proposed rules)
No open burning	To prevent fires onsite and offsite	Adams (current rules); Broomfield:(OP/Agreement); Aurora (OP/Agreement).
Incident reporting upon discovery for spills, releases, fires, explosions, lightning strikes, accidents, fatalities, injuries, chemical exposures and any events requiring medical attention	Provides emergency responders and County additional site-specific information. Provides information for annual meeting discussions	Adams (current rules) Aurora (draft rules) Broomfield:(OP/Agreement);
Spill reporting	Required by COGCC but also gives emergency responders notice; Provides information for annual meeting discussions.	Boulder (proposed rules)
All flammable liquid spills of 5 or > gals	Provides emergency responders advance notice if they have to respond to that location. Provides information for annual meeting discussions.	Aurora (draft rules)
Spill response kits at each pad or carried by field staff	To mitigate small to medium-sized spills (5-50 gallons) before they migrate.	Unique to AC
Discharge valves secured	To protect against spills and vandalism	Aurora (draft rules)
Automatic Safety Systems on all new facilities	Allow remote detection of upset conditions; Allows remote facility shut in.	Adams (current rules); Broomfield: (OP/Agreement); Aurora: (OP/Agreement & proposed rules).
Lightning Protection for all sites with tanks	Reduces extent of lightning damage	Unique to AC
Setback of 1,000' from edge of pad to nearest occupied structure or nearest boundary of a platted lot and a minimum of 250' from the property line	Allows room for emergency responders to address emergencies; Reduces potential offsite impacts.	Adams (current rules); Larimer (current rules); Thornton (current rules); and Broomfield (proposed rules).
Reverse or Reciprocal Setbacks of 250' from a property line – Staff will reexamine	Allows a portion of the room needed for emergency responders; Protects nearby structures.	Adams (current rules) COGCC opinion
Operator shall maintain a 350' setback from buried infrastructure	May aid in prevention of damage to water or sewage lines, buried electrical lines or fiber optic lines	Aurora (proposed rules)
Operator shall provide maps of all off-pad flowlines	For prevention of explosions caused by excavation work	Aurora (proposed rules)