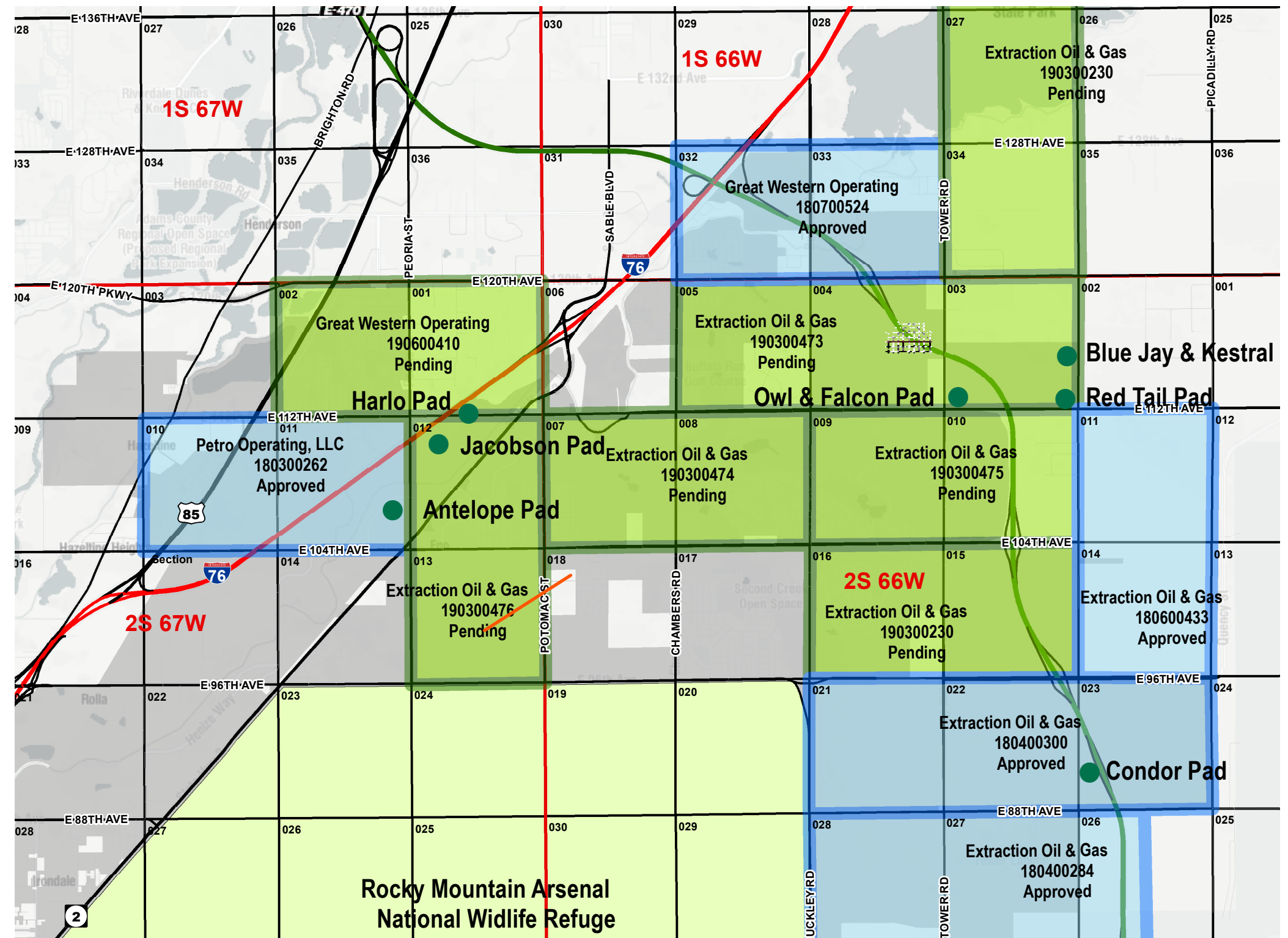




Oil and Gas in Commerce City: Why are we here?

Renewed industry interest

In spring 2018, oil and gas operators began showing interest in new drilling in a number of metro-area municipalities, including Commerce City. Oil and gas activity has previously occurred here and active wells do exist in the city currently, but new drilling has not happened in a number of years. This change has sparked a citywide conversation among residents, city council and staff, industry representatives and other stakeholders.



Need for updated regulations

The city's priority is to minimize impacts and maximize protections for the community while respecting private property rights. Senate Bill 19-181, which was signed into law in April, changes the way oil and gas is regulated at the state level. Commerce City and other municipalities are now working to navigate this new landscape.

In addition to negotiating a Regional Operator Agreement with Extraction Oil & Gas, LLC (the operator proposing most of the new drilling in the area), the city has been working on updating its oil and gas regulations in the **Land Development Code (LDC)**. These regulations were last updated in 2012.

4 main areas being reviewed and considered:

- Best Management Practices (BMPs) that address health, safety, quality of life and environmental concerns
- The impacts of SB 19-181, including increased local control over oil and gas
- Regulatory actions being taken by other cities and counties (e.g. Adams County)
- Community feedback on potential revisions and the city's approach to code updates

Terms to know

Land Development Code (LDC): This document contains all the land use rules and laws that govern Commerce City, including zoning, oil and gas regulations, and much more.

Regional Operator Agreement (ROA): This optional process between the city and an individual oil and gas operator sets terms and restrictions for that company's operations that differ from those contained in city regulations.

Best Management Practices (BMPs): A list of protections and standards designed to address health, safety, quality of life and environmental concerns related to oil and gas.

Colorado Oil and Gas Conservation Commission (COGCC): The state agency that regulates oil and gas development in Colorado, including the state permitting process. A division of the Colorado Department of Natural Resources.



Regional Operator Agreement with Extraction Oil & Gas

Regional Operator Agreement (ROA) Process

Updating city regulations is a different process from the recently approved ROA with Extraction Oil & Gas, LLC, the operator that is proposing seven well pad sites within the city. While not required in the city's code, the agreement was negotiated over 18 months with feedback from residents, city council and other stakeholders.

By negotiating in good faith with Extraction, the city achieved increased protections that - in many cases - exceed those in existing state law. The protections in the ROA are more restrictive than what would be in place if Extraction had applied for oil and gas permits under the current regulations in the **Land Development Code (LDC)**. The process of creating the ROA has helped set the stage and prepare the city to update its oil and gas regulations.

What the ROA does:

- Sets broad requirements for Extraction's proposed well pads in the city
- Requires Extraction to follow an extensive list of **Best Management Practices (BMPs)** addressing health, safety, quality of life and environmental concerns
- Sets terms for inspections and enforcement of BMPs and other requirements

What the ROA does NOT do:

- Allow Extraction to start new operations in the city
- Approve any specific well pad site
- Require the city to approve any proposed location
- Provide Extraction with vested rights



ROA vs. LDC: What's the Difference?

ROA

Regional Operator Agreement

- Sets broad requirements for proposed Extraction Oil & Gas drilling sites
- Requirements negotiated and agreed upon by the city and Extraction
- Administratively approved by city staff

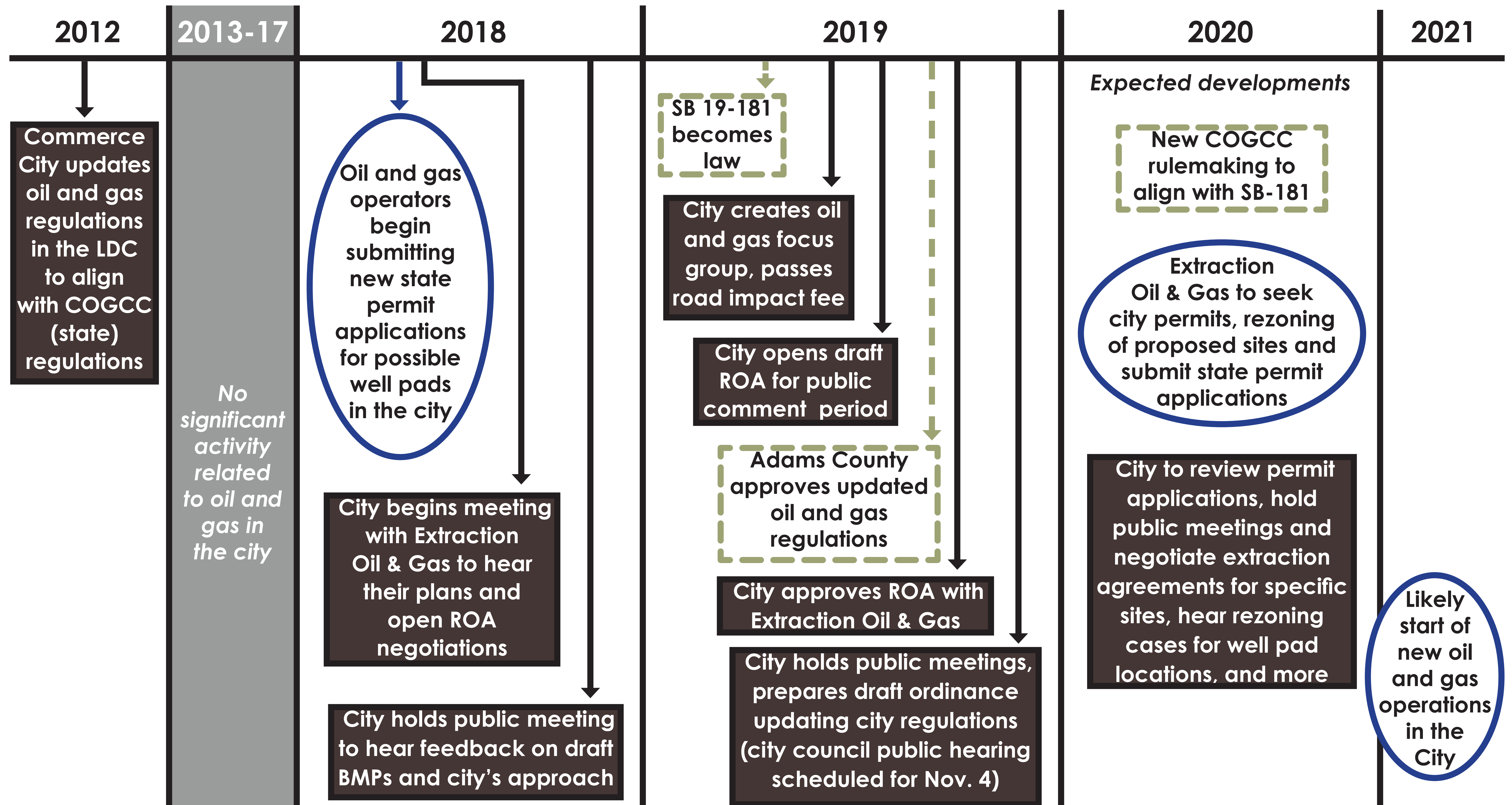
LDC

Land Development Code

- Sets requirements for all potential well pads and operators
- Requirements apply to all new applications and operators
- Approved through a city council process that includes a public hearing



Oil and Gas in Commerce City: Recent Timeline

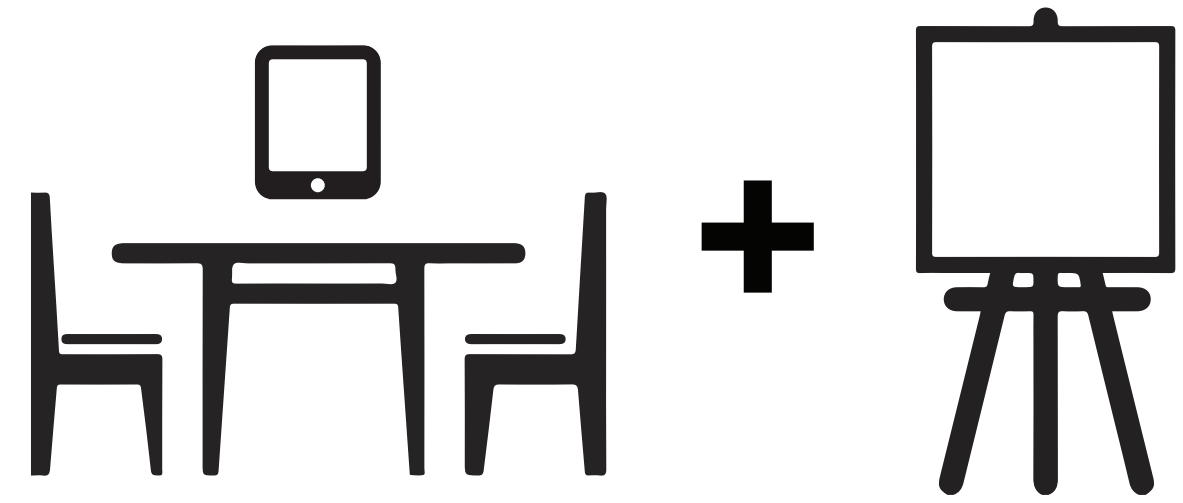




WHAT HAPPENS TO MY FEEDBACK?

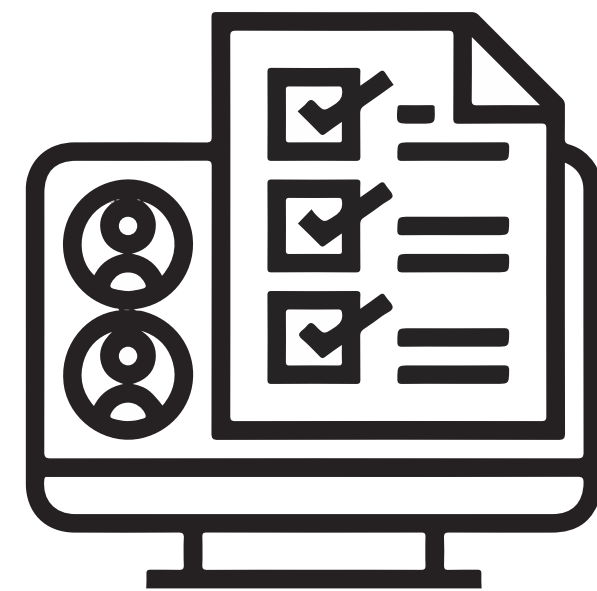
As part of the Land Development Code process, evaluating feedback and listening to public response on the larger code concepts proposed is critical to ensuring the final regulations reflect the needs and desires of the community. The city's role is to develop an outcome that best reflects the interest of the public, especially when there isn't shared consensus from all members of the community.

GIVE US YOUR FEEDBACK



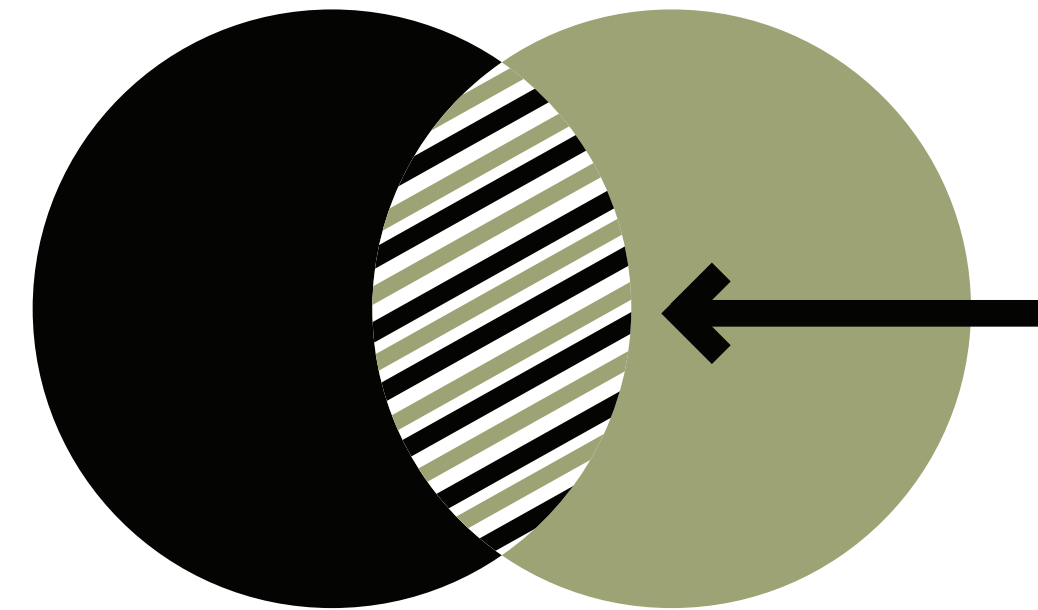
TALK WITH CITY STAFF, INTERACT WITH THE BOARDS REQUIRING PUSH-PINS, THEN FILL OUT A SURVEY AT THE ROUND TABLES IN PAPER OR DIGITAL FORMAT.

REVIEW OF ALL FEEDBACK



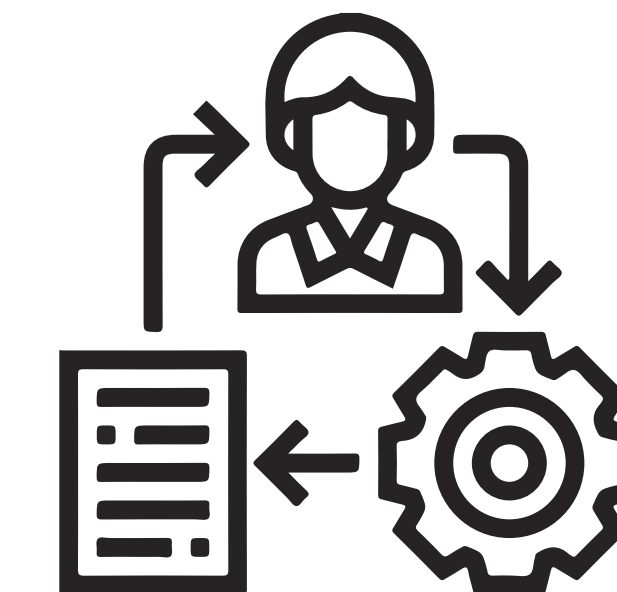
STAFF WILL REVIEW ALL FEEDBACK RECEIVED DURING THE MEETING, AND EXPLORE METHODS TO INCORPORATE FEEDBACK INTO DRAFT CODE

FINDING MIDDLE GROUND



UNDERSTANDING SHARED CONSENSUS MAY NOT EXIST, THE CITY WILL ATTEMPT TO BALANCE ALL VIEWPOINTS TO INCORPORATE REGULATIONS WITH THE BEST OUTCOME

COUNCIL STUDY SESSION



STAFF WILL PRESENT FEEDBACK RECEIVED DURING PUBLIC MEETINGS AND STAKEHOLDER MEETINGS TO COUNCIL DURING A STUDY SESSION FOR FEEDBACK ON OCTOBER 14

DRAFT REGULATIONS



BASED ON COUNCIL DIRECTION, STAFF WILL GENERATE A DRAFT ORDINANCE FOR PUBLIC REVIEW

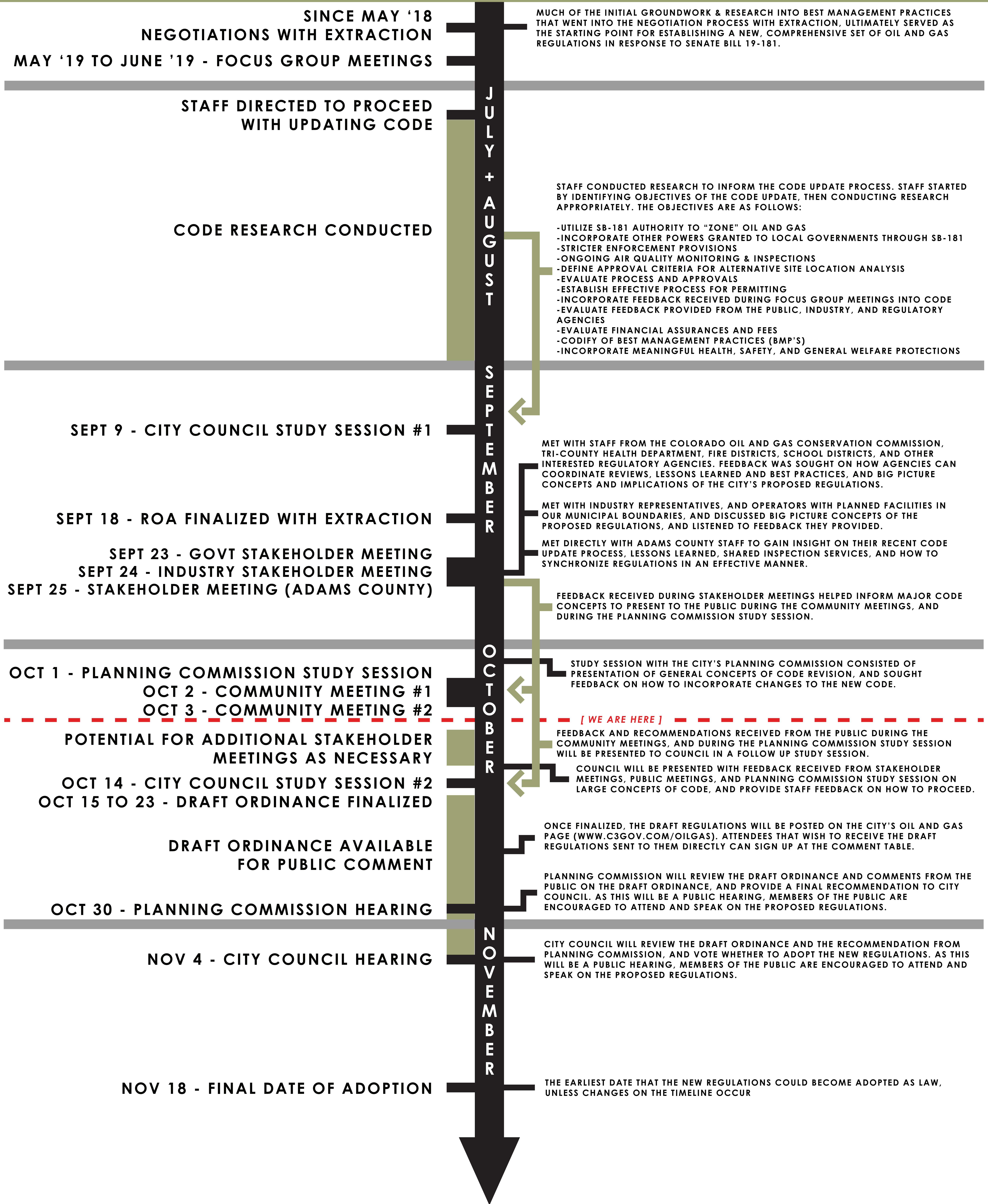
WHY UPDATE THE CODE NOW?

After signing the Regional Operator Agreement with Extraction Oil and Gas, a number of protections were gained, as it pertained to those sites, that may not have been accomplished otherwise through our current code. After the passing of SB-181, Adams County recently passing regulations, lessons learned from the ROA process, and city's base regulations not having enough significant protections, this is an appropriate time to assess what changes should be made. If a separate operator were to submit permits under the city's current code, there is no guarantee the same protections could be negotiated as the city's current ROA with Extraction.



CODE UPDATE PROCESS

To help illustrate where we are now, and where we are going with the Land Development Code, we've provided a timeline for updating the City's code:





SENATE BILL 19-181

Passed by the Colorado State Legislature in April, 2019, SB181 ensures that oil and gas development and operations in Colorado are regulated in a manner that protects public health, safety, welfare, the environment and wildlife resources.

KEY POLICIES AND REGULATIONS



Enhances Local Government Authority To:

- Regulate land use, surface impacts, and siting of oil and gas locations
- Inspect oil and gas facilities and impose fines for leaks, spills and emissions
- Impose fees to cover direct and indirect costs for permitting, regulation, monitoring and inspections
- Where local and state regulations conflict, the most protective standard for health, safety, welfare, the environment and wildlife resources will apply



Colorado Oil and Gas Conservation Commission (COGCC)

- Updates mission from “fostering” the oil and gas industry to “regulating”
- Requires COGCC board members who are trained in wildlife protection, environmental protection, soil conservation/reclamation, and public health



Grants New Oversight Authority To:

- State of Colorado commissions on air quality control, water quality control, solid and hazardous waste, and State Board of Health

Alternative Site Location Analysis

- Requires alternate location analyses for new oil and gas facilities proposed near populated areas and evaluation of cumulative impacts of oil and gas development

Commerce City is updating its Land Development Code using this authority granted by state regulations, along with best management practices and local resident feedback, to achieve the safest and highest quality oil and gas operations.



OIL & GAS FOCUS GROUP

In February 2019, City Council appointed a 9-member Oil & Gas Focus Group to provide input to City staff on both City and State regulations. The group met five times from April to June, 2019, discussing a number of items related to potential code changes and provided recommendations to the city.

TOPICS COVERED IN FOCUS GROUP MEETINGS

 **Air and water quality**

 **Zoning and Siting**

 **Health and Safety**

 **City Regulations**

 **Enforcement & Fees**

 **Permitting & Review Process**

 **Best Management Practices**

 **State Regulations**

HOW WAS FEEDBACK USED?



Focus group members discussed and debated topics between themselves and with City staff.



Focus group members provided City staff with a diverse range of feedback regarding potential City regulations.



City staff is incorporating feedback in updates to the Land Development Code (including what you are seeing here today).



FOCUS GROUP RECOMMENDATIONS

The following contains a high level overview of some of the recommendations that were provided to the city during the focus group meetings, organized by topic category:



BEST MANAGEMENT PRACTICES

- Use of electric equipment always as a standard;
- Pipeline utilization for all new application to reduce truck traffic and help air quality;
- Standards on pipeline durability, maintenance, and care, if not already handled through a state or federal agency;
- Testing of air quality and water quality (testing could occur at time of production, after production, more at the beginning, constant throughout, etc.)
- Real time air monitoring
- Waste management of trash but also left over oil and gas supplies.
- Post closure care and continued monitoring
- Seismic studies or analysis needed

Some members felt the following items should not be included:

- Health and safety plans for workers (already regulated by OSHA)
- Pipeline removal requirement (some pipelines and flowlines don't necessarily need to be removed and/or it is unsafe to do so)
- Inspection frequency guidelines



ZONING AND SITING

- Reciprocal setbacks were desired from a number of the focus group members, regarding not only setbacks from new wells to existing houses, but from existing wells to newly constructed homes
- Define and distinguish in the LDC whether setbacks apply from the property line, or building/structure
- Disclosure for new homebuyers, notifying them of mineral right ownership (if present), potential wells, pipelines, flowlines, etc.
- Have a greater setback (at least 1,000') for parks and other "healthy uses" – recreation centers, certain food production, etc.
- No additional setback for industrial properties
- Some members felt only appropriate to be zoned in industrial zone districts
- Some members felt it was appropriate to be zoned in industrial and commercial zone districts
- Some members felt agricultural zoning was appropriate depending on future land use
- Some members felt it was not appropriate in any zone district.
- All members felt that sites should be evaluated on a case by case basis to some degree.



ENFORCEMENT AND FEES

- Desire to have fees built into the application (all inclusive), rather than various points in the process, where the operator may not know all fees going into the application.
- Acknowledgement that city does not have currently employed subject matter experts on the oil and gas industry to help navigate, implement, and hold accountable the rules and process that are being developed (especially technical data- air and water quality, being able to review technical reports, etc.). Desire for the City to hire such necessary staff, refer materials out to appropriate state review agencies, and pass costs onto operators in the form of application or other related fees.
- Desire for total transparency of fines and actions: If a company is fined, would like to know what the fine was for, the number of fines, the corrective measures that happened and what the restitution was
- There is a lack of community education – especially for the Hispanic community. Would like more information about the ongoing operations to be put out via bilingual information



PERMITTING AND REVIEW PROCESS

- Some members of the focus group felt that administrative approvals were adequate, and some wanted all permits to be reviewed by City Council.
- A major component of the discussion surrounded notification and outreach, including larger notice radiuses for public meetings,
- Some members of the group who had previously attended city open houses, and felt that this type of format would be effective for neighborhood meetings.
- There was some discussion about allowing unique conditions on different locations, since the impacts could be varied.
- There was desire for outreach to the Spanish speaking community, including translation of documents, translators present at meetings, and an extra level of effort of communication – not just those in proximity to the wells.



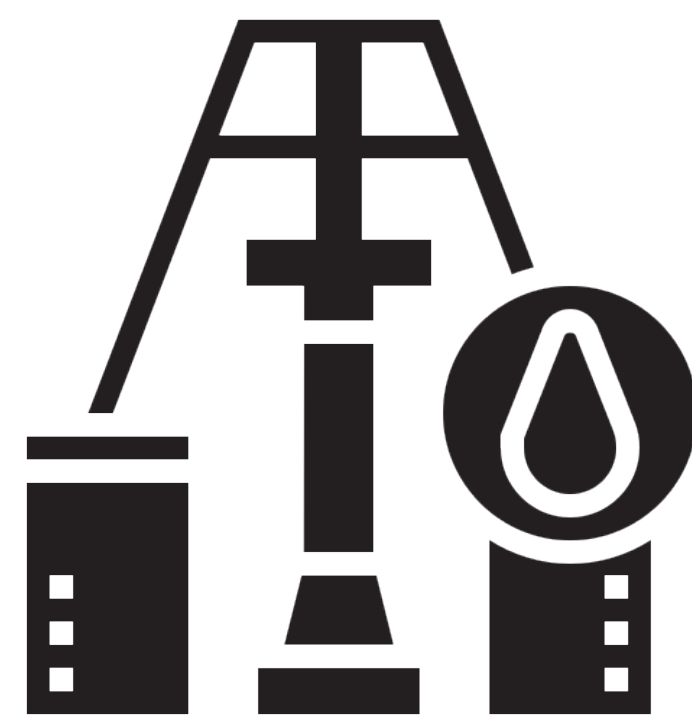
AIR QUALITY MONITORING

With Senate Bill 181 allowing Local Governments the ability to impose additional regulations for air quality monitoring, the city is exploring adding strict requirements for continuous air quality monitoring on all new sites. Given technology in this area is advancing at a rapid pace, the city is working with several vendors to gather information on best technologies, and explore options.

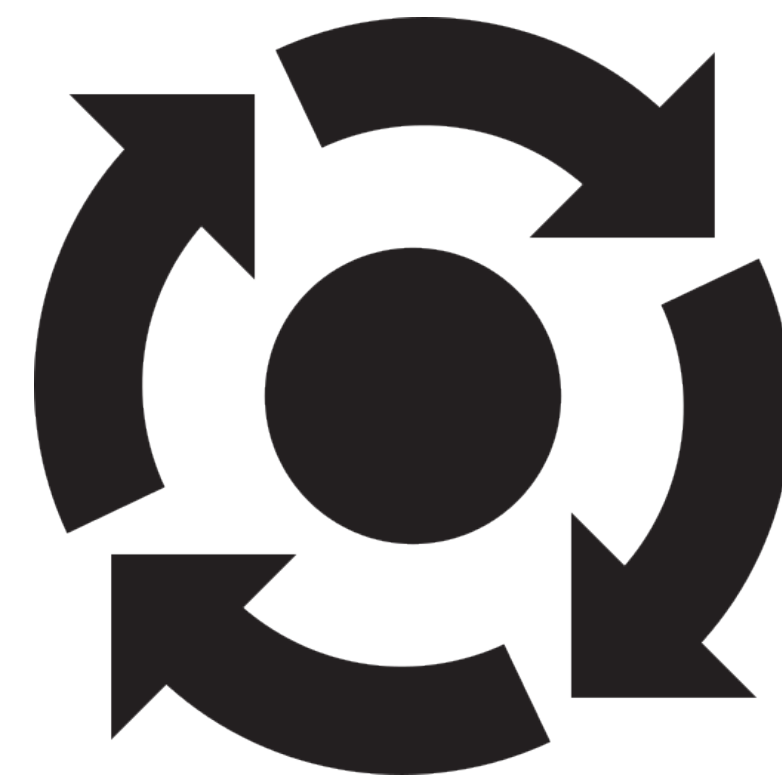
PROGRAM REQUIREMENTS



**BASELINE
SAMPLING OF ALL
WELL SITES**



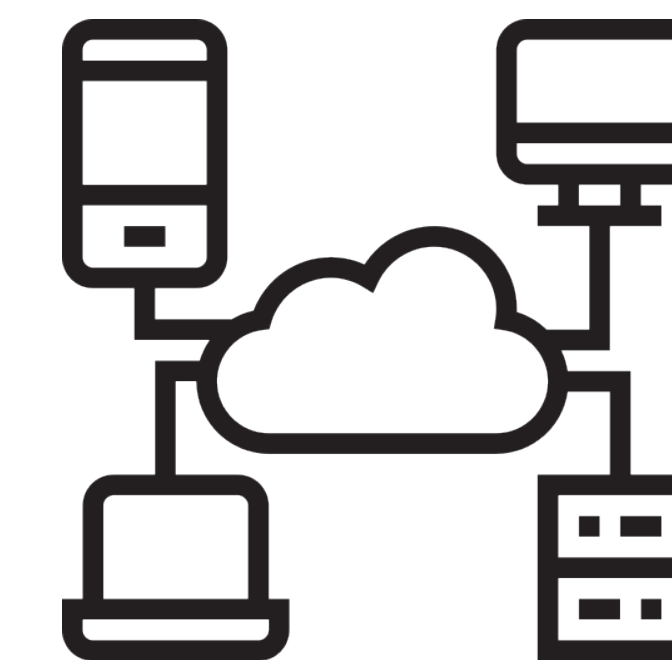
**SAMPLING DURING
DRILLING AND
COMPLETIONS FOR
ALL WELL SITES**



**CONTINUOUS
MONITORING FOR
THE LIFE OF THE
WELL**



**REAL TIME
REPORTING OF AIR
QUALITY DATA**



**DATA PORTAL
AVAILABLE TO THE
PUBLIC**



**OPERATOR TO BEAR
ALL COSTS OF
MAINTAINING
PROGRAM**

HOW WILL THE PROGRAM WORK?

State rulemaking on air quality monitoring is currently pending, and that process could result in statewide requirements similar to those above. Until such rulemakings occur, the city plans to have an ongoing air quality monitoring program in place. The city plans to utilize the Colorado Department of Public Health and Environment (CDPHE) in its assessment of the data collected from the program. The city also plans to establish a list of approved air quality vendors that operators are able to utilize.



ALTERNATIVE LOCATION ANALYSIS

SB-181 clarified the authority of local governments in regulating the location of Oil and Gas Facilities. The city is considering a detailed pre-application process that requires operators to evaluate potential locations that have the least impact on public health, welfare, safety and the environment. Operators would not be eligible to submit for a permit until the analysis is conducted, and is deemed a suitable location by the city.

EVALUATION PROCESS



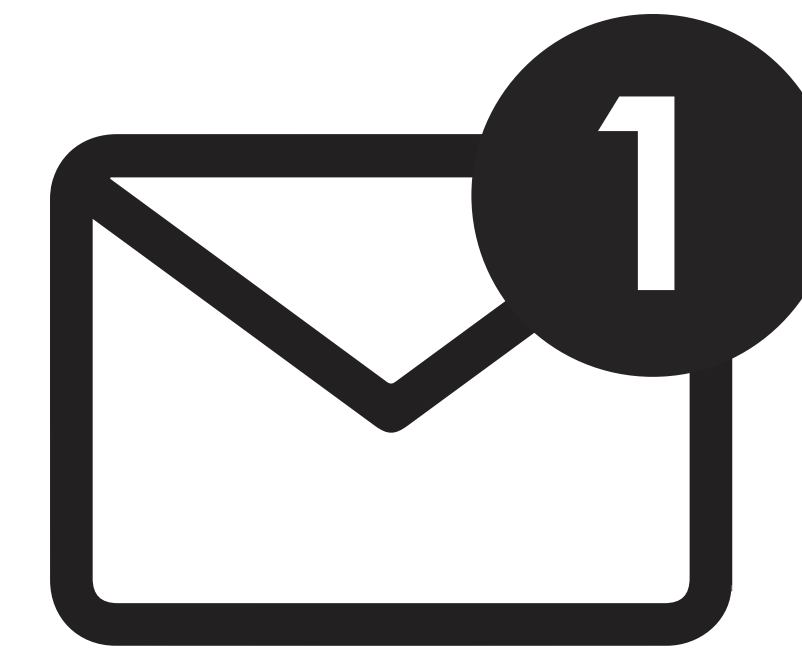
**OPERATOR SUBMITS
ANALYSIS DURING
PRE-APPLICATION
PROCESS.**

3

**MINIMUM OF 3
POTENTIAL SITES
SUBMITTED FOR
REVIEW.**



**STAFF REVIEWS
AGAINST STATED
CRITERIA**



**STAFF IDENTIFIES,
THEN NOTIFIES
APPLICANT WHICH
SITES ARE ELIGIBLE
(POSSIBLE 0 ARE)**



**ONLY MOST
PROTECTIVE SITE
SELECTED**



**APPLICANT
ELIGIBLE TO APPLY
FOR PERMIT AT
THAT LOCATION**

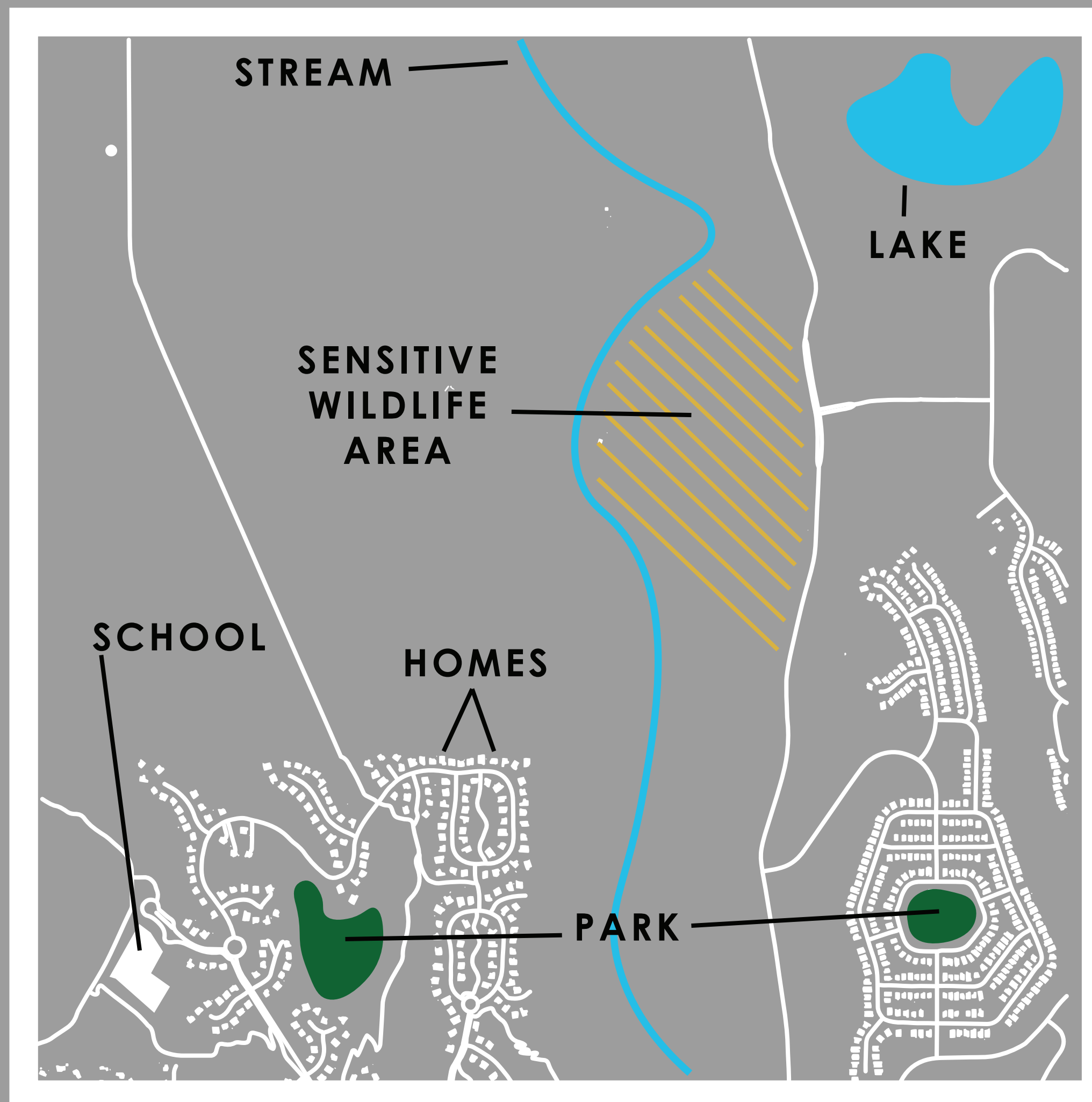
REVIEW CRITERIA - MAY INCLUDE PROXIMITY FROM:

- Residences
- Schools
- Parks
- Recreation Facilities
- Streams
- Protected Land & Habitat
- Sensitive Wildlife Areas
- Future Residential Areas
- High Occupancy Buildings
- Senior Living Facilities
- Preference to areas zoned for industrial uses



ANALYSIS EXAMPLE

The following example shows the methodology that would be used to evaluate an alternative site location analysis. This example is not representative of any submitted or pending application, but for demonstration purposes only.



1) Evaluate Existing Conditions



2) Evaluate criteria, measure distances, then propose sites



3) Select site with least impact

- = Proposed Location
- = 1,320' from group A criteria, and 0' from group B criteria
- = 2,000' from group A criteria, and 500' from group B criteria

GROUP A

- Residences
- Schools
- Parks
- Recreation Facilities
- Senior Living Facilities
- Future Residential Areas
- High Occupancy Buildings

GROUP B

- Streams
- Water Bodies
- Sensitive Wildlife Areas



SETBACKS & ZONING

Given the authority to regulate siting and location through SB-181, the city intends to place more stringent setback regulations than what our current regulations allow. The city is also considering to limit the type of zone districts that facilities would be allowed in. The city is proposing the following configuration:

SETBACKS

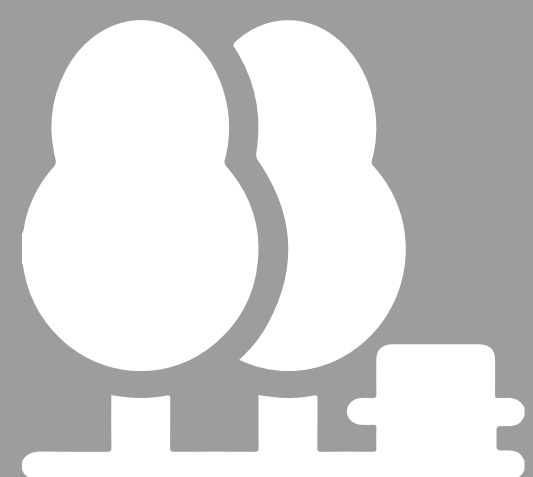
The city is exploring a minimum setback anywhere between **1,000** feet and **1,320** feet (1/4 mile) from the following facilities:



- Existing Residences
- Platted (planned) Residences
- Agricultural properties under 10 acres



- Any facility considered a “High Occupancy Building Unit” by the COGCC
- Including Schools, Rec Centers, Assisted Living, etc.

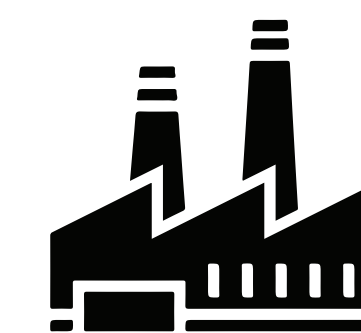


- Public parks (not including trails or city open space)
- Outdoor playgrounds, sports fields, amphitheaters

The city is also exploring a “reverse setback” of **300’** for newly constructed homes to existing facilities. New homes would still have to be within the 1,000’ or 1,320’ setback until all wells on the pad site have been drilled, and it enters what is called “production phase.” At that time, the impacts are significantly less than when the site is being drilled.

ZONING

In addition to the setback requirements, Oil and Gas facilities would be allowed in the following zone districts:



- I-1 (Light Industrial)
- I-1S (Stapleton Industrial Park)
- I-2 (Medium Industrial)
- I-3 (Heavy Industrial)



- AG (Agricultural, over 10 acres)



- C-2 (General Commercial)
- C-3 (Regional Commercial)

New facilities would be prohibited from:



- R-1 (Single Family)
- R-2 (Duplex)
- R-3 (Multi-Family)
- AG (Agricultural, under 10 acres)
- R-4 (Townhome)
- MHP (Mobile Home Park)
- Mixed Use



- C-1 (Local Commercial)



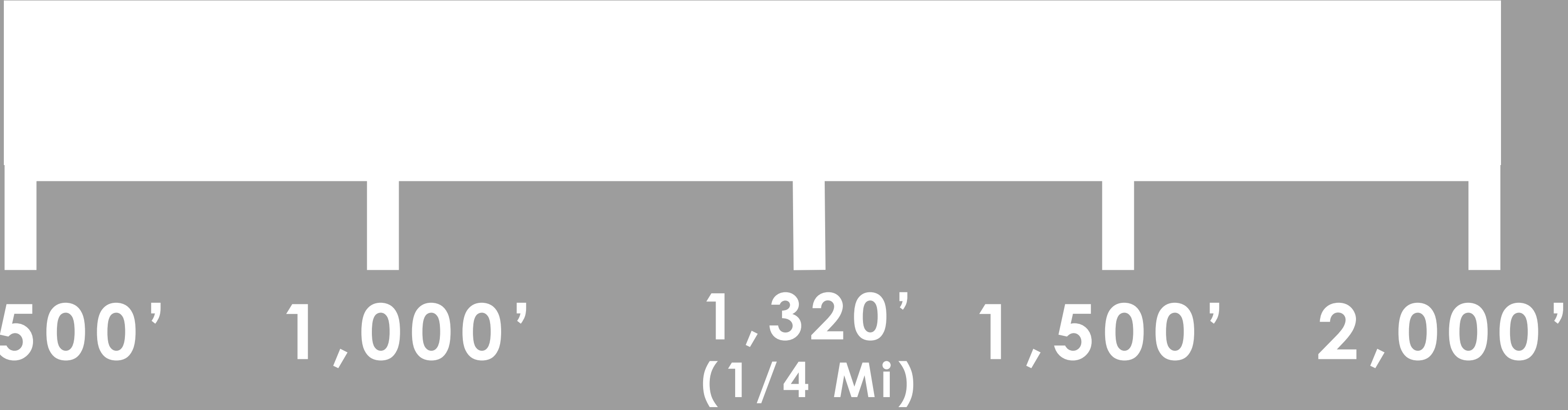
- Public

SETBACKS & ZONING

Add a pin in the corresponding box, where you feel is appropriate!

SETBACKS

“I think the minimum setback should be.....”



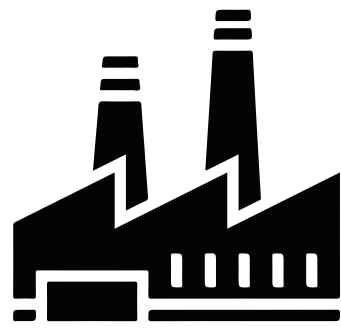
“Setbacks are necessary from the following.....”



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ZONING

“I think Oil and Gas should be allowed in the following zone districts.....”



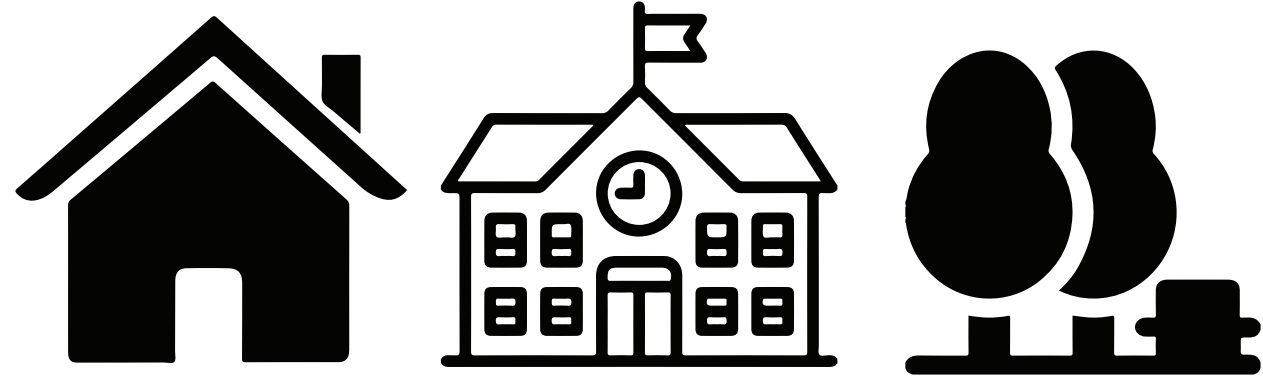


REVIEW PROCESS & BMP's

The city is exploring options for how the review process for an Oil and Gas Permit is handled, and how the Best Management Practices are implemented in the code. Place a pin in the boxes below, where you feel is appropriate.

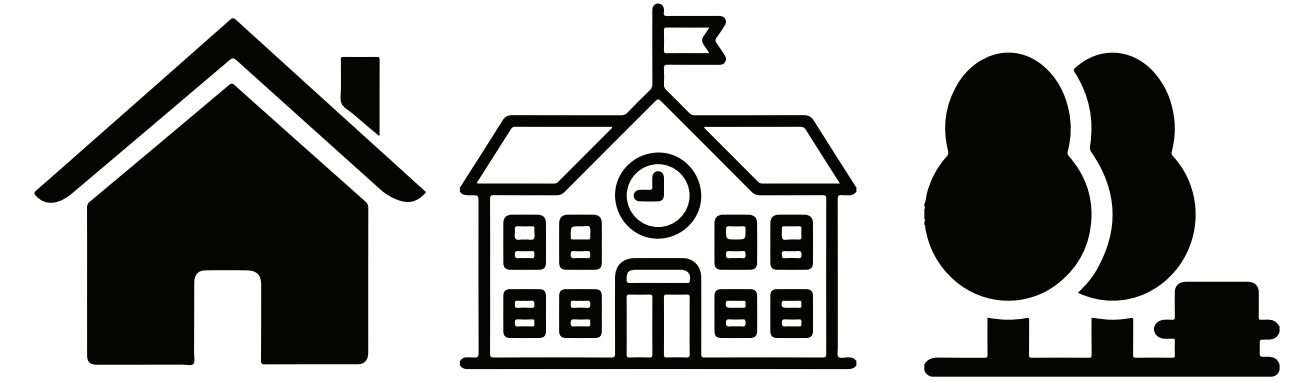
PROCESS

2,000' + FROM:



**+ ENHANCED BMP's
= ADMIN REVIEW**

< 2,000' FROM:



**+ STANDARD BMP's
= PUBLIC HEARING**

The city is contemplating a two tiered approach to permitting, which would allow operators with significant BMP's and a high proximity from the criteria defined in the setback regulations to pursue an administrative approval process. For sites that are not meeting these requirements, public hearings would be required with the city's Planning Commission and City Council prior to approval. This is a common practice currently for municipal oil and gas regulation throughout the state, and could provide an incentive for operators to have greater protections and move farther away from residences.

**I AM IN FAVOR OF A
TWO TIERED APPROACH**

**ALL SHOULD REQUIRE
A PUBLIC HEARING**

**ALL SHOULD BE REVIEWED
ADMINISTRATIVELY**

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BMP's

The city is contemplating two potential options for incorporating Best Management Practices into the code. Review both options, then place a pin in the box with your preferred method.

BMP's ADOPTED BY REFERENCE

- Adopted by council initially, then revised administratively on an annual basis
- Would allow for more nimble policymaking in an environment with rapidly changing technology
- Would be reserved for more technical aspects of the regulations - some key BMP's would remain in code
- Would require a comment period (14 days recommended) for any changes to the document
- Council or Community Development Director would have authority to trigger a public hearing if requested

BMP's ADOPTED INTO CODE

- Any changes would need to be approved by both Planning Commission and City Council in the decision making process
- Would give more discretion to Planning Commission and City Council in the decision making process
- Would make the city less flexible in response to changing and emerging technologies

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COMMERCE CITY BMPs - GENERAL OVERVIEW

The following is a general overview of items that would be regulated in the Best Management Practices Document. All items either meet or exceed COGCC Requirements.

TOPIC

PROPOSED BMP

AIR QUALITY

TIER 4 ELECTRIC POWERED DRILL RIG, COMPRESSORS, AND LIFT EQUIPMENT REQUIRED

OPERATOR TO BEAR FULL COST OF AIR QUALITY MONITORING PROGRAM

GLYCOL AND DESSICANT DEHYDRATORS ARE PROHIBITED

LOW ODOR DRILLING MUDS REQUIRED

LIMITED STORAGE TANKS

LEAK DETECTION AND REPAIR PROGRAM - ENHANCED TECHNOLOGY AND MONITORING TIMELINES

HIGH EFFICIENCY COMBUSTION REQUIREMENTS

WATER QUALITY

PROHIBITION OF 15 FRACKING CHEMICALS KNOWN TO BE DANGEROUS & DISCLOSURE OF PROPRIETARY CHEMICALS

INJECTION WELLS PROHIBITED

NO DRILLING WITHIN FLOODPLAINS

WASTEWATER REQUIRED TO BE PIPED FROM WELLPADS IN MOST CIRCUMSTANCES

SAFETY

FLOWLINES REQUIRED TO BE REMOVED

SITE SECURITY PLAN FOR EACH WELL PAD

OPERATOR ASSISTANCE WITH EMERGENCY RESPONSE TRAINING

RISK MANAGEMENT PLAN



COMMERCE CITY BMPs - GENERAL OVERVIEW

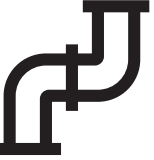

The following is a general overview of items that would be regulated in the Best Management Practices Document. All items either meet or exceed COGCC Requirements.

TOPIC	PROPOSED BMP
 VISUAL MITIGATION	PIPELINES - NO STORAGE TANKS NO PUMPJACKS ALLOWED STAGED LANDSCAPING REQUIREMENT UP TO 30 FOOT SOUND WALLS DURING DRILLING LOW PROFILE VESSELS
 NOISE MITIGATION	NOISE MITIGATION PLAN REQUIRED IF WITHIN 1/4 MILE OF A HOME CONTINUOUS NOISE MONITORING IF WITHIN 1/4 MILE OF A HOME QUIET FLEET TECHNOLOGY REQUIRED IF WITHIN 1/4 MILE OF A HOME NOISE MAY NOT EXCEED 55db OR 4db OVER BASELINE LEVEL C-SCALE NOISE MITIGATION
 COMMUNITY OUTREACH	NOTIFY ADJACENT NEIGHBORS OF DRILLING, INCIDENTS, AND ACCIDENTS BI-ANNUAL UPDATE TO CITY COUNCIL OPERATOR WILL MAINTAIN A 24/7 COMPLAINT RESPONSE HOTLINE
 RECLAMATION	REQUIREMENT FOR PLUGGING AND ABANDONMENT OF EXISTING OPERATOR VERTICAL WELLS RECLAMATION PLAN REQUIRED -INTERIM RECLAMATION: LANDSCAPING AND BERMING -FINAL RECLAMATION: RESTORE TO ORIGINAL STATE AND REMOVE EQUIPMENT



COMMERCE CITY BMPs - GENERAL OVERVIEW

The following is a general overview of items that would be regulated in the Best Management Practices Document. All items either meet or exceed COGCC Requirements.

TOPIC	PROPOSED BMP
 USE OF PIPELINES	<p>BMPs REQUIRES PIPELINE UTILIZATION FOR MOST SITES</p> <p>OPERATOR WILL UTILIZE PIPELINES FOR TRANSPORTING OIL, GAS, AND WATER</p> <p>MANY BMPs ARE DIRECTLY ATTRIBUTED TO THE UTILIZATION OF PIPELINES</p> <ul style="list-style-type: none">-SIGNIFICANTLY REDUCED TRUCK TRAFFIC-REDUCED EMISSIONS & DUST
 EMERGENCY RESPONSE	<p>24 HOUR EMERGENCY CONTACTS WITH EXTRACTION</p> <p>FIRE DISTRICT & CITY APPROVAL OF EMERGENCY RESPONSE PLAN</p> <p>EMERGENCY EVACUATION PLAN</p> <p>OPERATOR PROVIDES FIRE DISTRICT EMERGENCY RESPONSE EQUIPMENT</p>
 INSPECTIONS	<p>CITY AUTHORITY TO INSPECT ANY FACILITY AT ANY TIME, WITHOUT PRIOR NOTICE</p>
 TRANSPORTATION	<p>TRAFFIC CONTROL PLAN REQUIRED</p> <ul style="list-style-type: none">-TRUCK ROUTING MAP-ACCESS LOCATIONS-HAUL ROUTES-ESTIMATED VOLUMES <p>MUD TRACKING MEASURES</p> <p>ROAD IMPACT FEE REQUIRED - HIGHER PAYMENT FOR SITES NOT UTILIZING PIPELINE</p>
\$ INSURANCE	<p>REQUIREMENT FOR GENERAL LIABILITY, AUTOMOBILE LIABILITY, WORKERS COMP, UMBRELLA/EXCESS LIABILITY, AND ENVIRONMENTAL LIABILITY INSURANCE.</p> <p>\$120M IN COMBINED COVERAGE REQUIRED</p>



REGULATION COMPARISON

TOPIC		COGCC REGULATION	ADCO REGULATIONS	C3 ROA / BMP'S	C3 CURRENT CODE
Setbacks		500' from existing residential	1,000' Setback from:	No specific setback requirement	No specific setback requirement – negotiated through Operator Agreement
		1,000' from High Occupancy Building Units	Schools	1 site (Harlo) within 1,000' of ADCO criteria	
		Additional protections for sites with 22 residences within 1,000' radius (Large UMA)	Platted or ex residential	Additional BMP's apply for sites within 1,320'	
			Licensed daycares		
			Waterbodies		
Zoning	N/A		Allowed in zoning districts:	All proposed sites within PUD Zone Districts	All districts except public, with an oil and gas permit
			A-2	Only reunion currently allows (with a CUP)	
			A-3	All other sites will require re-zoning PUD to allow Oil and Gas facilities	
			Commercial		
			Industrial		
Variances		Variance process available through COGCC	Variance process allowed through public hearing for sites not meeting criteria	No such waiver	N/A
Alternative Site Analysis		Not currently required – rulemaking pending	Alternative Site Analysis Required	Required through code	Required, but specifics not identified
Noise	Max 80dB(a) adjacent to residential uses		Noise control mitigation standards, electric rigs, noise mgmt. plan	Similar requirements for use of electric drilling rigs	No such requirements
			No maximum decibel limit	Noise max: 55db or 4db over baseline	
				Additional requirement of quiet fleet technology	
Inspections		No Inspection Fees	Inspection fees – duplicating current COGCC fine schedule	\$500/well/yr for inspections	No inspection fees
		Fee schedule in place	Monetary fines	Fine schedule defaults to current NS fine schedule – less than ADCO proposed	Current NS fine schedule
		\$100,000 financial assurance per operator for all wells currently	Financial assurances	More specific financial assurances & policy amounts	Less specific financial insurance, lower policy amounts
Air Quality	Regulated by air quality control commission		Significant BMP's related to emission reductions	Similar emission reduction BMP's and requirements	Not required
			Requirement for baseline air quality sampling and ongoing continuous monitoring	Operator contributing \$150,000/wellsite/yr for air quality monitoring + \$36,000/wellsite for baseline monitoring	
			Operator bears all cost		
Tanks		Not required	Implementation of tankless production facilities as county determines feasible	Tankless facility design (pipeline utilization)	Not required

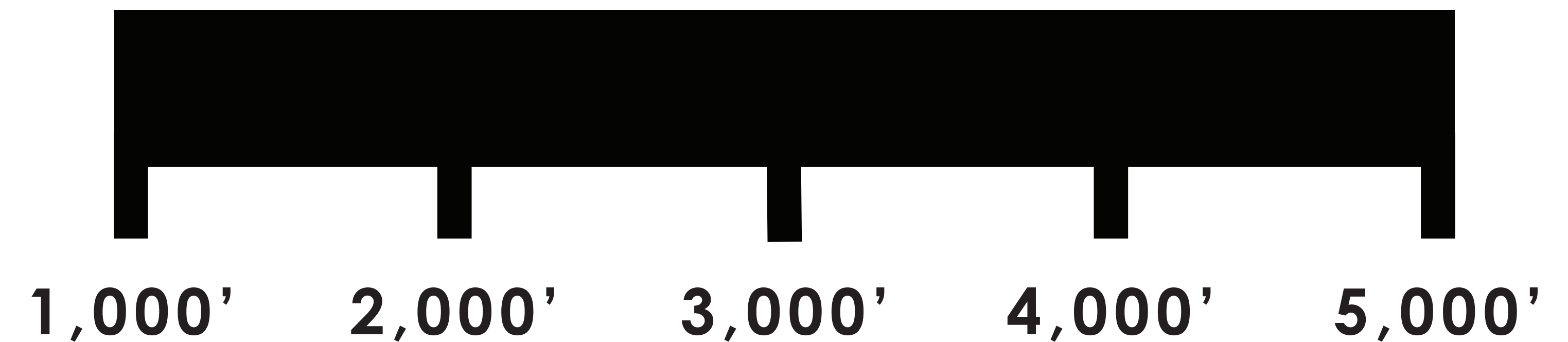


COMMUNITY OUTREACH & EDUCATION

The city intends to require that all Oil and Gas operators engage in significant public outreach and education to the community. It will be their responsibility to ensure the community is informed of their activities and educated on potential impacts.

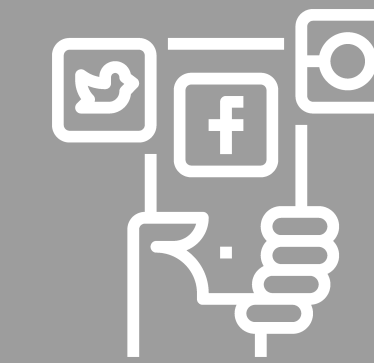
NOTICE REQUIREMENTS

Currently proposed regulations require public notification for all properties within a **2500ft** radius. Should this notification radius buffer be increased to a larger distance? Add a pin to the image to the right.



INCREASED COMMUNITY OUTREACH

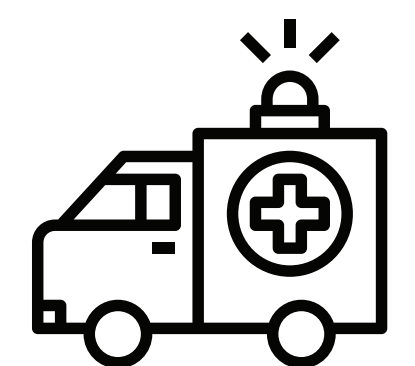
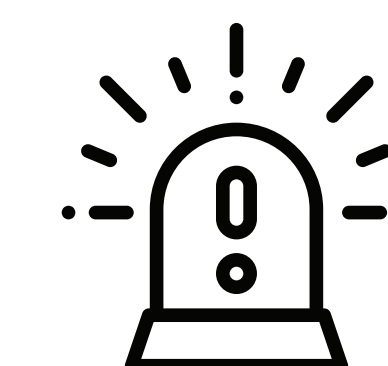
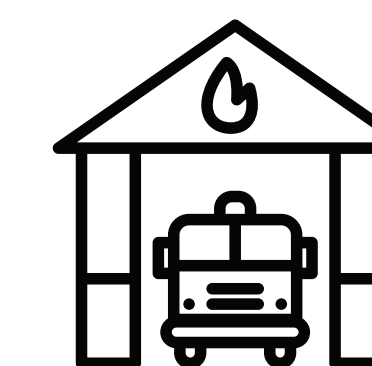
Multiple public meetings are required by the city, including a neighborhood meeting for all new Oil and Gas Permits and bi-annual ROA presentations to City Council. What additional outreach/education would you like to see?



- Summer public outreach
- School outreach and education
- Presentations to other entities or stakeholders (ex: USGS as a referral agency to analyze seismic activity)
- Other methods of communication

ENHANCED EMERGENCY COMMUNICATION

All Oil & Gas Operations are required to prepare an Emergency Response Plan, which includes public communication requirements. What additional emergency response notifications would you like to see?



- Operator complaint/emergency hotlines
- Increased emergency notification radius (currently required for all properties within a 1/2 mile buffer)
- Real-time notifications
- Emergency response coordination efforts