



COLORADO

**Oil & Gas Conservation
Commission**

Department of Natural Resources

Issues Deemed to be Outside of the Scope of the 500-Series Rulemaking

1. Changes to the Commission's variance process.
2. Changes to standing before the Commission or categories of persons entitled to notice.
3. Changes to the Commission's financial assurance requirements, including bonding.
4. Cumulative impacts.
5. Providing advocates to represent the public in Commission proceedings.
6. Substantive changes to Commission Rule 508.
7. Changes to the Commission's permitting requirements, including alternative site analysis and moratoriums.
8. Substantive changes to the Commission's enforcement authority, including penalty amounts.
9. The involuntary pooling of leased minerals.
10. The definitions of oil well and gas well.
11. The sequence of oil and gas development (leasing/pooling/spacing).

Issues 9 through 11 are those issues that are the subject of the June 14, 2019 proposal of the Colorado Alliance of Mineral and Royalty Owners, Colorado Oil & Gas Association, Colorado Petroleum Council, PDC Energy, Inc., Anadarko Petroleum Corporation, J. Gale Moody, the Estate of Ella Heitman, Firestone Mineral Holdings LLC, Thunder Ridge Resources LLC, and Joseph P. Rock, Jr.

The parties are not barred from speaking on the above issues during the rulemaking, but should be aware that the Commission will not pass rules regarding the above issues during the 500-Series Rulemaking. The parties should also be aware that this is a draft list and may expand over the course of the Rulemaking.

The Commission understands the importance of these issues, and expects that many, if not all, of the above issues will be the subject of future rulemakings as the Commission proceeds with the entire Senate Bill 19-181 rulemaking process.