



OIL AND GAS UPDATE

CITY COUNCIL SEPT 18, 2023
DR. ROSEMARIE RUSSO

PIPELINE SAFETY

Commerce City signed on to a consensus statement regarding the rule-making to implement Senate Bill 21-108

There are three categories under consideration :

- (1) Pipeline mapping;
- (2) Annual reporting of all leaks; and
- (3) Advanced leak detection.

Administrative Judge has not released decision.



GEMMS 2 PROCESS

- Air Pollution Control Division (APCD) tasked with developing rule to present to Air Quality Control Division;
- Commerce City joined 43 other local governments (LGC) to work with CDPHE to develop a program to reduce GHG from 18 large manufacturing facilities;
- Parties opposing APCD Rule: Cargill (Industrial); CECAC; EDF; Environmental Defense Fund; Family and Community Coalition (FCC); Garfield (Partial); LGC; Molson (Partial); Suncor
- APCD worked with industry, Co Energy Office; non-governmental groups and local government coalition (LGC)
- Prehearing Statements; rebuttal and hearing

HEARING: SEPT 20-22

Contentious Components

- Enforcement
- Baseline Adjustments
- Carbon Capture and Sequestration (CCUS)/Direct Air Capture (DAC)

Alternative Proposals

- Chamber of Commerce
- Environmental Defense Fund
- Suncor (Molson strongly opposes)

Public Comment

Approximately 15% from Commerce City residents; EPAC; Sustainability Team; residents in support of C3

Off-site reductions no longer an option

PARTIES – CO POLLUTANT BENEFICIAL & NEAR TERM REDUCTIONS

SUPPORTS

- CECAC
- CEO (Partial – 2 targets)
- Coors (Achieved 96% SO₂ and 56% NO_x)
- EDF
- Family Coalition
- Green Latinos

AGAINST

- AGC
- Chamber of Commerce
- Cargill
- EVRAZ/GCC
- FRE
- Leprino
- Natural Soda
- Rocky Mountain Bottling Co.
- Suncor

Date	Media Impact	Location/Unit	Summary	Exceedance	Permit Limit	Community Impact
8/24/2023	Air	Plant 1 – Gasoline Benzene Reduction Unit (GBR) faulty steam valve	The NHVcz in the GBR Flare dropped below the limit of 270 Btu/scf during two 15-minute periods as a result of the flare’s steam valve malfunction	Title V Operating Permit, Condition 60.7.2: Any 15-minute period in which waste gas is routed to the flare and the net heating value of flare combustion zone gas is less than 270 Btu/scf.	The Net Heating Value of the flare combustion zone in the GBR Flare dropped below the limit of 270 Btu/scf during two 15-minute block periods.	CCNDAM - NOT TRIGGERED
7/29/2023	Air	Plant 1 Main Plant Flare	The PSA unit trip caused the pressure controller on the Plant 1 main plant flare gas recovery system to automatically open as designed, redirecting gases with elevated concentration of hydrogen sulfide (H2S) to the Plant 1 Main Plant Flare.	162 ppm H2S in flare gas (3-hr rolling average)	192 ppm H2S in flare gas (3-hr rolling average)	CCNDAM - NOT TRIGGERED
7/14/2023	Air	Plant 1 Main Plant Flare	The pressure swing adsorption (PSA) unit at the Hydrogen Plant tripped. When the PSA unit trips the flare suction valve on the Plant 1 main plant flare gas recovery system must be closed in order to redirect gases with elevated concentration of hydrogen sulfide (H2S) to the Plant 1 Main Plant Flare. As a result, the Plant 1 Main Plant Flare gas H2S limit was exceeded. Operators worked diligently to bring the PSA unit back online and restore the Hydrogen Plant's functionality.	328 ppm H2S in flare gas (3-hr. rolling average)	162 ppm H2S in flare gas (3-hr. rolling average)	CCNDAM - NOT TRIGGERED

Date	Media Impact	Location/Unit	Summary	Exceedance	Permit Limit	Community Impact
7/12/2023	Soil	Plant 2 Oil Movements Division (OMD-2)	Diesel Line Leak, approximately 5 barrels of diesel were released to soil	N/A		The leak remained within the containment area and did not reach any surface water or groundwater
7/4-5/2023	Air	Plant 2 No. 2 FCCU	Plant 2 No. 2 FCCU underwent startup activities after a planned turnaround event. During the startup, opacity and carbon monoxide (CO) limits were exceeded at the No. 2 FCCU. Suncor operators followed protocols to minimize opacity and CO emissions.	38% opacity (6-minute average)	Opacity not to exceed 20% at the No. 2 FCCU (6-minute average)	CCNDAM - NOT TRIGGERED
7/4-5/2023	Air	Plant 2 No. 2 FCCU	Plant 2 No. 2 FCCU underwent startup activities after a planned turnaround event. During the startup, opacity and carbon monoxide (CO) limits were exceeded at the No. 2 FCCU. Suncor operators followed protocols to minimize opacity and CO emissions.	1,030 ppm CO (1-hour average)	500 ppm CO (1-hour average)	CCNDAM - NOT TRIGGERED
7/4-5/2023	Air	Plant 2 No. 2 FCCU	Plant 2 No. 2 FCCU underwent startup activities after a planned turnaround event. During the startup, opacity and carbon monoxide (CO) limits were exceeded at the No. 2 FCCU. Suncor operators followed protocols to minimize opacity and CO emissions.	1,974 ppm CO at 0% O2 (1-hour average)	500 ppm CO at 0% O2 (1-hour average)	CCNDAM - NOT TRIGGERED

DEVELOPMENT REVIEW

- Settler's Crossing Filing 3 PUD Amendment approved August 29th.
- Site has a plugged/abandoned well
- Commerce City Code: 50 ft. radius from any habitable structure

Adams County Development Regulations:

- Dedicated a well maintenance and workover setback (>fifty feet in width and 100 feet in length) depicted on the plat;
- The well shall be located in the center of the setback and identified;
- The owner shall disclose notice to prospective purchasers;
- All known oil and gas well flow lines and/or easements shall be graphically depicted on the Final Plat.

THANK-YOU
QUESTIONS?

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