



COLORADO
OIL & GAS
ASSOCIATION

1660 LINCOLN ST.

SUITE 2710

DENVER, CO 80264

Phone 303.861.0362

Fax 303.861.0373

WWW.COGA.ORG

May 18, 2012

The Honorable Sean Ford, Mayor of Commerce City
and Members of City Council
City Clerk's Office
7887 East 60th Avenue
Commerce City, CO 80022

Submitted VIA Email

RE: COMMERCE CITY'S PROPOSED OIL AND GAS REGULATIONS

Dear Mayor Ford and Members of City Council:

The Colorado Oil and Gas Association (COGA) is writing to express industry's concern to the proposed revisions of the Land Development Code (LDC). Colorado already has some of the most comprehensive oil and gas regulations in the country and provides for meaningful local involvement. Many of the City's provisions contained in the proposed LDC are overreaching and duplicative of State rules.

Among the most problematic provisions is the requirement that operators execute an "extraction agreement." While COGA supports consensual agreements between the city and operators, COGA is not supportive of the City's attempt to circumvent state law via a mandate to enter into an onerous agreement in order to engage in the development of oil and gas resources.

Industry would like to continue to work collaboratively with Commerce City to address deficiencies in the proposed regulations. As you may recall, COGA was a participant in the Commerce City Oil and Gas Land Use Review Committee, formed to address changes to the LDC. Many jurisdictions have benefited from a positive relationship with the oil and gas industry, and it is our hope Commerce City will do the same.

Thank you for the opportunity to participate in this ongoing process.

Sincerely,

A handwritten signature in blue ink, appearing to read "Andrew Casper".

Andrew Casper
Regulatory Counsel