



**JOHN W. SUTHERS**  
Attorney General

**CYNTHIA H. COFFMAN**  
Chief Deputy Attorney General

**DANIEL D. DOMENICO**  
Solicitor General

**STATE OF COLORADO**  
**DEPARTMENT OF LAW**

**OFFICE OF THE ATTORNEY GENERAL**

**STATE SERVICES BUILDING**  
1525 Sherman Street - 7th Floor  
Denver, Colorado 80203  
Phone (303) 866-4500

May 9, 2012

Bob Gehler, Esq.  
City Attorney's Office  
City of Commerce City  
7887 East 60th Ave.  
Commerce City, CO 80022

RE: Proposed Oil and Gas Regulations

Dear Mr. Gehler:

I am writing on behalf of the Colorado Oil and Gas Conservation Commission (COGCC) to express the COGCC's concern that Commerce City's proposed oil and gas regulations give rise to operational conflicts with the COGCC's comprehensive regulatory regime, including:

- The City's mandate that operators sign a document prepared by the City specifying how and under what conditions operations will take place in the City.
- The City's proposed wildlife mitigation plans and vegetation analysis plans.
- The "prohibitions" identified in the proposed regulations.

The above provisions, and others, will give rise to operational conflicts. The COGCC requests the City forgo conflicting regulations and work collaboratively with the COGCC to address local concerns. Please feel free to contact Thom Kerr, acting director of the COGCC, to discuss the many ways in which the COGCC can address local concerns, and serve as a resource for the City in its land use regulation reform process.

Sincerely,

FOR THE ATTORNEY GENERAL

JAKE MATTER  
Assistant Attorney General  
Resource Conservation  
Natural Resources & Environment