

COLORADO FRONT RANGE COALITION OF LOCAL GOVERNMENTS

January 25, 2021

TO:

John L. Adgate, Ph.D, MSPH
Professor and Chair
Department of Environmental and Occupational Health
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FROM:

- City of Aurora
- Boulder County
- Boulder County Public Health
- City & County of Broomfield
- Broomfield Public Health Department
- Colorado Communities for Climate Action
- City of Commerce City
- Town of Erie
- City of Fort Collins
- City of Westminster

RE: Letter of Support for Measuring and Modelling Air Pollution and Noise Exposure Near Unconventional Oil and Gas Development in Colorado

RFA Number and Title: HEI E20-1 Community Exposures Associated with Unconventional Oil and Natural Gas Development

Dear Drs. Adgate, Collett, McKenzie, and Pierce:

Please accept this letter as a formal endorsement of the proposed study referenced above. The undersigned represent a coalition of Colorado Front Range governments that regularly coordinate strategy and policy in the Oil & Gas sector.

The oil & gas industry is employing completely novel techniques that are not well understood, but have resulting impacts to the public. We, in the jurisdictions where this is taking place, are struggling to institute proper regulations and oversight, given the unprecedented pace with which this energy revolution is taking place. Frequently, we are left with more questions than answers when attempting to understand or respond to public concern and adopt meaningful regulations that protect public health, safety and welfare.

This grant proposal would provide valuable information to help each of our governments predict impacts from new oil and gas activities proposed in our communities. Rather than relying solely on the industry itself for this information, the study as proposed would provide insight and guidance for local regulatory and oversight efforts. Local governments have limited resources to invest in the study of impacts of oil and gas development, and yet we are on the front lines of inspecting and regulating this industry in our communities. In urban areas, the impacts of the oil and gas industry are far reaching, as we monitor health impacts and the individual and cumulative impacts of the industry on human life and the environment. More information is needed to assess the impacts associated with noise, air, soil, water, wildlife and human health. The technology and impact of the oil and gas industry is proceeding at a rate faster than what local municipalities can keep up with in terms of protecting the health and safety of our residents.

The overall goal of your proposed research, the development of community exposure profiles for air pollutants and noise over the lifecycle of UOGD multi-well pads, will be instrumental in both informing scientifically-sound policy decisions as well as effectively responding to citizen concerns regarding potential health implications of UOGD. Further, your proposal aims to evaluate air pollutant emissions stemming from all aspects of UOGD including some less scrutinized operations and processes like pulling (aka “tripping”) pipe , coil tubing operations, liquids unloading, blowdowns, and handling/treatment/disposal of flowback and/or produced water. It is essential that local governments understand which specific UOGD processes and operations are contributing to air pollutant emissions and noise, and to what degree, in order to inform our citizens of potential impacts during specific operations and to effectively develop and enforce policies aimed at protecting public health and the environment.

Your research team has our enthusiastic support for the development of community decision-support tools that will enable us to more proactively anticipate impacts of proposed UOGD and develop effective operator agreements that incorporate best management practices to mitigate air toxics emissions and noise from operations likely to produce the most severe impacts for our communities. We are also enthusiastic about supporting your plans for public engagement.

The proposed study is timely and relevant as our residents continue to report impacts related to noise and potential exposure to toxic volatile organic compounds. The aims of the grant would get us closer to understanding exposure impacts to nearby residents from air toxics and noise which remains a significant interest to our public and elected officials. Specifically it could point us in a direction of helping to better inform and direct future epidemiological studies and improve our understanding of what modeled exposures might look like for residents living in proximity to oil and gas development. We appreciate past engagements with Dr. Collett and the Atmospheric Science Department at Colorado State University to monitor air toxics near oil and gas development. He has been an invaluable resource for several Front Range air quality projects and we look forward to engaging with him, and your broader scientific team, on your proposed efforts that will build on extensive air monitoring data from various front range locations.

As representatives of numerous Colorado local governments impacted by UOGD, we are committed to the success of your proposed research and will support your study team by providing access to existing information (e.g., air monitoring data, UOGD operational timelines and best management practices, summaries of citizen complaints), help facilitate your planned outreach efforts to local government officials and residents, and provide timely feedback on decision-support tools being developed for local government use.