

April 14, 2025

RE: Public Comment on Proposed Revisions to Regulation 3 and Regulation 7 – April 2025
Rulemaking

Members of the Air Quality Control Commission,

The Associated Governments of Northwest Colorado (AGNC) is a council of governments representing counties and municipalities across one of Colorado's most rural regions, where energy development is essential to our economic stability. As the federally designated Economic Development District and administrator of the Northwest Colorado Enterprise Zone, we are committed to fostering policies that support our communities' prosperity alongside responsible environmental stewardship. We write to express significant concerns regarding the proposed revisions to Regulation 3 and Regulation 7, scheduled for your April 2025 hearing, and their potential to place undue economic and administrative burdens on our small businesses and local governments—particularly as Northwest Colorado already faces substantial challenges from the coal transition.

Northwest Colorado is not Denver. Our air quality meets federal standards, and nearly 78% of our land is public, with energy operations typically located far from population centers. Unlike urban areas, our region does not face comparable air quality pressures, yet we are disproportionately affected by economic shifts. The ongoing transition away from coal has already impacted our communities more severely than any other part of the state, and additional regulatory burdens on our remaining energy industries could further jeopardize our ability to sustain vital jobs and services.

Consider QB Energy, which operates hundreds of well pads across Rio Blanco and Garfield counties. As a key contributor to our regional economy, QB Energy would face increased reporting requirements and compliance costs under these revisions—obligations that may strain its operations. This burden extends to the small businesses in towns like Rifle, Rangely, and Meeker, including contractors, welders, truckers, and service providers, who rely on energy companies like Caerus for their livelihoods. These businesses are integral to our communities' well-being.


The broader implications are considerable. Northwest Colorado's already clean air that is in full compliance with standards will not benefit from the proposed rules and fee increases. The proposed rules are not fitted to the needs of Northwest Colorado and should be adjusted to consider and avoid harming our economic foundation. Energy employment and revenue support our schools, roads, and local governments. Further constraints on this sector, atop the landslide of other regulatory cost burdens placed on industry the last decade, the coal transition, risk undermining the stability of our region. Small businesses, already contending with rising

operational costs, are the core of our rural economy—regulations that do not reflect our distinct circumstances could place their viability in jeopardy.

We respectfully request that the AQCC consider a regionally appropriate approach to Regulation 3 and Regulation 7. Measures such as streamlined reporting for remote sites, extended compliance timelines, or thresholds tailored to our rural setting would align with the state's environmental objectives while preserving our economic resilience. A uniform regulatory framework may be suitable for the Front Range, but it does not account for Northwest Colorado's unique challenges and strengths.

Thank you for your thoughtful consideration of our region's needs as you deliberate these regulations.

Sincerely,

A handwritten signature in black ink, appearing to read "Cody Davis", with a long horizontal flourish extending to the right.

Cody Davis
AGNC Chair
Mesa County Commissioner

A handwritten signature in black ink, appearing to read "Chris Nichols", with a stylized, cursive script.

Chris Nichols
AGNC Vice-Chair
Craig City Mayor