

Pamela Eaton
1105 Ithaca Drive
Boulder, CO 80305
July 13, 2020

Colorado Oil and Gas Conservation Commission

Re: Cause: 1R, DOCKET NO. 200300071, Mission Change Rule Making

Dear Commissioners:

Though I am not a party to this rulemaking, I want to submit a proposed change to the Staff's revised draft rules of June 26, 2020 during this process while you are considering additional specific language changes. I will provide more complete comments by July 13.

Rule 302.c.(4) should be revised as follows:

302.c. Director's Review of Local Government Siting Information.

(4) For proposed Oil and Gas Locations listed in Rule 302.b.(4), the Operator will submit an alternative location analysis pursuant to Rule 304.b.(2), unless the Director determines in the Completeness Determination that an alternative location analysis is not necessary to protect public health, safety, welfare, the environment, or wildlife resources. The Director may not waive the alternative location analysis requirement for any Oil and Gas Location that meets the criteria listed in Rule 302.b.(4).A-C and J.

For COGCC to meet the goals laid out in the Statement of Basis and Purpose to public health, safety, welfare, the environment, or wildlife resources to make one of the main factors the Commission intends the Director to consider "the environmental justice implications of the proposed oil and gas location" the Director should not be granted the power to waive alternative locations analysis for locations that impact disproportionately impacted communities.

It is so important that the Commission "recognizes that environmental justice is an important concern in selecting oil and gas locations. Not all communities surrounding oil and gas locations are the same. Some communities, especially low-income communities, communities of color, and tribal communities, have historically borne a disproportionate burden of environmental harms, while enjoying disproportionately fewer environmental and socioeconomic benefits."

Assuring that the concerns of disproportionately impacted communities are considered will be strengthened by revising section 302.c.(4) as proposed above.

Thank you for consideration of these comments.

Sincerely,



Pamela Pride Eaton