

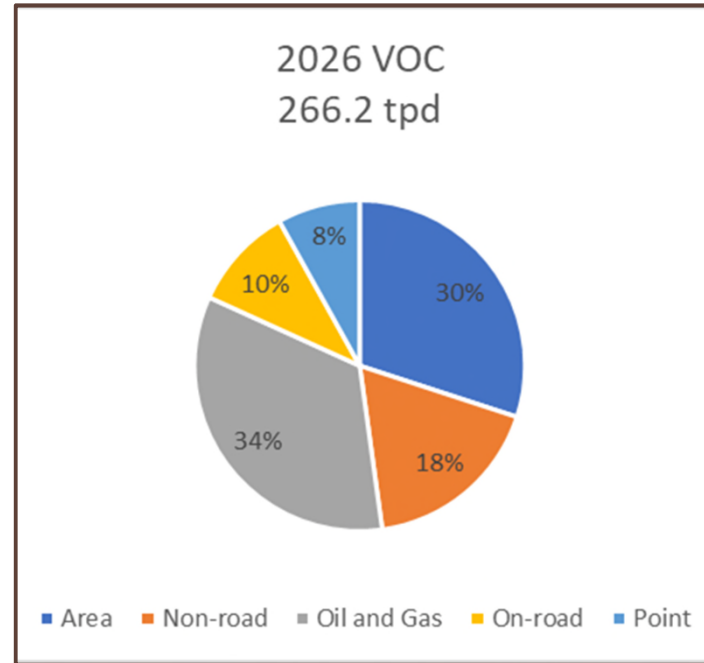
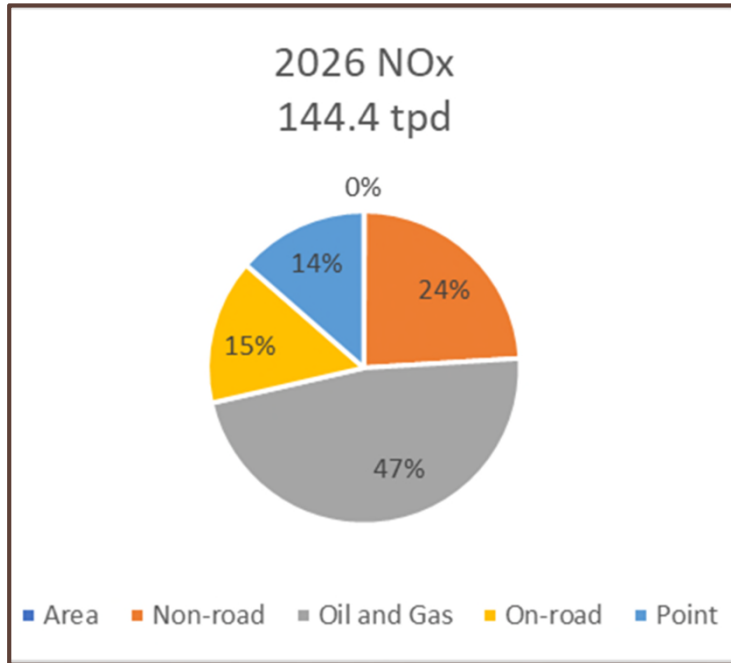
# HB 24-1330

## Air Quality Permitting





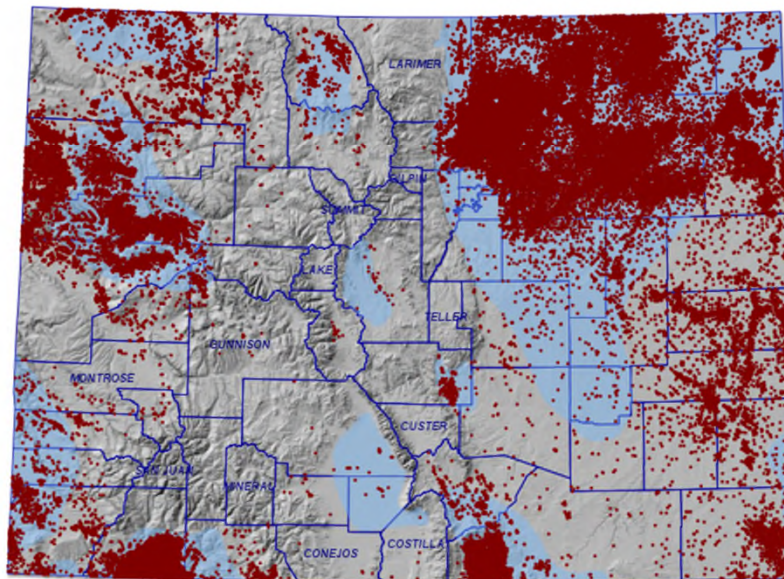
Oil and gas emissions (in grey) are the primary driver of our ozone crisis, mainly *pre-production emissions*





Ozone nonattainment area

Active oil and gas wells



# Colorado's permitting processes have significant loopholes

- The Air Pollution Control Division allows oil and gas operators to break up their operations into many, smaller permits. This allows sources to avoid air quality impact analysis.
- The Air Pollution Control Division fails to include pre-production emission in permitting. Though these sources are a significant driver of ozone pollution, they are exempted from air permitting requirements.
- Silo-ed processes at the Energy and Carbon Management Commission and Air Pollution Control Division allow operators to construct oil and gas operations before an air permit is finalized.

## HB24-1330 requires:

- *Aggregation* - that emissions across an oil and gas location are treated as one source to ensure a more accurate account of the emissions of a project
- *Inclusion of pre-production emissions* - that pre-production emissions are included in air pollution permits
- *Increased air quality analysis in the permitting process* - including by requiring air quality modeling of at least the 1-hour NOx standard
- *An air permit before breaking ground* - specifically by requiring that oil and gas operators obtain a permit to pollute from the APCD before the ECOMC makes a final determination to issue a permit to drill or frack