

EARTHWORKS

February 10, 2026

Earthworks appreciates the opportunity to provide comments on the proposed revisions to Regulation 7 to continue the process of aligning Colorado's rules with the U.S. Environmental Protection Agency's (EPA) 40 C.F.R. Pt. OOOOc.

Earthworks is a nonprofit organization committed to working with frontline communities to address the adverse impacts of mining and energy development on public health and the environment while promoting sustainable solutions. For more than 10 years, Earthworks staff have worked on the ground with local partners across the US and the world to use FLIR G-Series optical gas imaging (OGI) cameras¹ to expose harmful hydrocarbon pollution from oil and gas facilities. This extensive field experience and our strong relationships with communities impacted by oil and gas production and processing guides our advocacy and informs our engagement with local, state, and federal regulators and lawmakers. We strive for reformed policies and stricter rules that put the lives of people before the interests of industry.

Since 2014, Earthworks has worked with partners across the US to raise public awareness about methane pollution from the oil and gas industry and to advocate for federal methane standards. After the EPA finalized New Source Performance Standards OOOOb and OOOOc targeting methane emissions in the oil and gas sector in 2024, we have advocated for states such as Colorado to move promptly to implement the new standards at the state level. We were supportive of the February 2025 revisions to Regulation 7 that initiated this process and adopted a new aggressive timeline for the statewide phase out of gas-emitting pneumatic controllers from oil and gas facilities. Those revisions encouragingly put Colorado on track to accomplish this goal ahead of the 2029 deadline set by the EPA rule. Similarly, we support the Air Pollution Control Division's (APCD) current proposed revisions to Regulation 7.

The Air Quality Control Commission (AQCC) should adopt APCD's revised proposal in full. The proposed revisions are sensible and necessary to ensure state-level alignment with the EPA rule. In particular, we support the direct requirement of certain best management practices in the transmission and storage segment as is required by OOOOc. We have long maintained that operators should be required to adopt the best practices and technologies available to them to reduce emissions and protect public health and the environment. These are necessary outcomes of air quality regulation. They should never be contingent on an operator's discretion.

Dedicated to protecting communities and the environment from the adverse impacts of mineral and energy development while promoting sustainable solutions.

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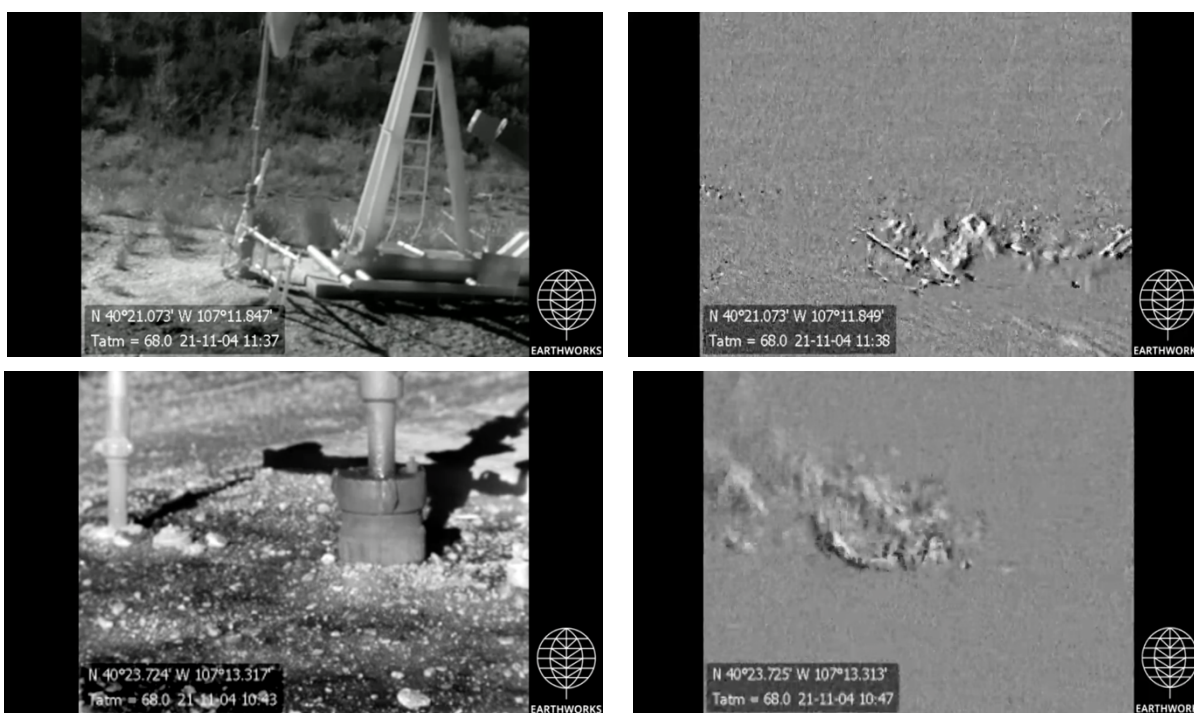
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¹ <https://www.flir.com/products/flir-g-series/>

AQCC must also reject industry proposals that seek to alter APCD's proposal. We support Environmental Defense Fund's (EDF) position² that the AQCC must reject the Joint Industry Working Group's proposal³ to create an alternative leak detection and repair (LDAR) framework for wellhead-only facilities that would require only quarterly Audio, Visual, Olfactory (AVO) inspections of single well-head only facilities. This proposal would undermine protections for Colorado communities and weaken Colorado's current LDAR framework by applying a new, lower standard to a subset of well production facilities where harmful emissions are known to occur. As EDF points out, it is also indefensible when the data from the Regulation 7 LDAR program routinely demonstrates that AVO inspections are not effective for leak detection.

Our extensive field experience, consisting of hundreds of surveys of Colorado well production facilities using an OGI camera, demonstrates the effectiveness of using specialized technology rather than human senses to detect odorless, invisible hydrocarbon emissions. We routinely identify emissions due to leaks and equipment malfunctions. Since 2021, operators in Colorado have repaired faulty equipment and/or taken other corrective actions to address emissions we have identified using an OGI camera on over 145 occasions. In some cases, an odor or sound can correlate with an observation of emissions, but even in these cases, accurately identifying the leaking component or malfunctioning equipment is challenging without the aid of an Approved Instrument Monitoring Method (AIMM) such as an OGI camera.



OGI images showing emissions from wellhead leaks at two different locations. Top Row: a single wellhead visualized both in grayscale (Left) and in the FLIR GF320 OGI camera's High Sensitivity Mode (Right) where the plume of hydrocarbon gases leaking from the stuffing box is more visible in a still image and can be seen moving off-frame beyond the pumpjack. Bottom Row: a single wellhead visualized again both in grayscale (Left) and FLIR GF320 OGI camera's High Sensitivity Mode (Right) where leaking hydrocarbon gases are more visible in a still image and can be seen escaping from the stuffing box.

² https://drive.google.com/file/d/1TXymnfVWLqBnRbH16GCKG5ZnIBlkSDUP/view?usp=drive_link

³ https://drive.google.com/file/d/1N74bWS9bsRknlPCRro5EFroH-Qbfjn75/view?usp=drive_link

Our experience also highlights the importance of considering the potential for emissions from wellhead-only facilities, including those with only a single wellhead. Wellhead leaks do occur, even when wells are shut-in or abandoned,⁴ and can release significant quantities of hydrocarbon gases, including harmful VOCs that can pose a threat to public health in nearby communities. LDAR using an AIMM such as an OGI camera is also highly effective at these facilities given that the absence of additional sources of emissions like storage tanks limits the number of sources that must be inspected for leaks, particularly on single wellhead wellhead-only facilities.

Colorado has long served as a leader in taking action to reduce methane and volatile organic compound emissions from the oil and gas sector. By advancing efforts to align the state's rules with the EPA methane rules, Colorado is once again modeling action and demonstrating a commitment to achieving emissions reductions that other states should follow. It is also important that Colorado continues to demonstrate the authority of states to exceed the standards set by the EPA to achieve even greater emissions reductions and protections for local communities impacted by oil and gas air pollution. Adopting the proposed revisions to Regulation 7 is a necessary and important step in ensuring that Colorado remains at the forefront of efforts to address climate change and protect public health from harmful pollutants.



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⁴ <https://earthworks.org/blog/the-tip-of-the-iceberg/>