

OPERATIONAL STANDARDS OVERVIEW TABLE
NEW AND EXISTING DEVELOPMENT

Item	State Requirements	Additional City/County Requirements
AIR QUALITY		
Leak Detection and Repair	Requires a leak detection and repair (LDAR) program, reporting requirements, and prompt repair of any discovered leaks.	Larimer County requires repairs completed ASAP but no later than 72 hours after discovery. For inspection purposes, detection of leaks requires specialized equipment and training. The City is planning to purchase an Optical Gas Imaging (OGI) camera, and the County will train and deploy field personnel to support routine inspections and complaint response.
Odor Complaint Response	The Colorado Department of Health and Environment (CDPHE) has odor thresholds, and odor complaints are navigated by both the CDPHE and Colorado Oil and Gas Conservation Commission (COGCC).	Larimer County already enforces odor limits on behalf of CDPHE, using specialized odor detection equipment and trained field personal. New OGI camera will also be used in response to oil and gas odor complaints to better detect and respond to odors.
WATER QUALITY		
Water Quality Protection	The COGCC has strong water quality protection requirements that address down-hole well bore integrity. Spill and public water supply protection must be coordinated with local governments and public water suppliers.	For new and existing development, the County requires the operator to outline coordination needed to respond to a spill and when public water supplies may be threatened.
NUISANCE		
Noise Mitigation	Current regulations permit increased noise during drilling and completion; Continuous monitoring is required during drilling and completion within 2,000 feet of building unit.	Existing City noise limits apply. Additionally, County requires noise mitigation plans and monitoring for any new development.
SAFETY		
Emergency Preparedness and Response	COGCC requires an emergency response plan but defers entirely to local government agencies and emergency responders	This is the area where coordination from the city and emergency responders is essential, and the City and County will jointly work with operators and Poudre Fire Authority (PFA) to update plans that meet new County standards.
RECLAMATION		
Financial Assurances and Plugging and Abandonment Requirements	COGCC adopted new financial assurance requirements, including bond requirements to ensure appropriate plugging and abandonment, increased bonds for low producing wells, and the ability for local governments to request wells to be plugged that are no longer used or useful.	City and County will explore new authority to request wells be plugged and abandoned that are no longer used or useful.